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8  
9  
10 **UNITED STATES DISTRICT COURT**  
11  
12 **DISTRICT OF NEVADA**

13 SONALOLITA WILSON

14 CASE NO.: 2:18-CV-01241-JCM-NJK

15 Plaintiff

16 vs.

17 | **JOINT PRETRIAL**

18 | **ORDER**

19 UNITED STATES OF AMERICA ; LICETH  
20 DEMHA-SANTIAGO; JUAN DEMHA;  
21 DOES I THROUGH X; AND ROE  
22 CORPORATIONS 1 THROUGH X,

23 Defendants.

24 COMES NOW Plaintiff, SONALOLITA WILSON (“Plaintiff” or “Wilson”), by and through her attorneys, BRADLEY S. MAINOR, ESQ., and ASH MARIE BLACKBURN, ESQ., of MAINOR WIRTH LLP; and Defendants UNITED STATES OF AMERICA, LLC (“USA”), by and through their attorneys, SKYLER PEARSON, ESQ., and PATRICK ROSE, ESQ., of OFFICE OF UNITED STATES ATTORNEY DISTRICT OF NEVADA, Defendants LICETH DEMHA-SANTIAGO (“SANTIAGO”) and JUAN DEMHA (“DEMHA”) by and through their attorneys, STEVEN T. JAFFE, ESQ. AND JAN K. TOMASIK, ESQ. of HALL JAFFE & CLAYTON, LLP; and submit the Joint Pretrial Order pursuant to LR 16-3.

25 | **I.**

26 | **A. Summary of Action**

27 This is a personal injury action arising out of two motor vehicle collisions that occurred on  
28 September 1, 2016, between Plaintiff WILSON and Defendant USA and Plaintiff WILSON and

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1 DEMHA-SANTIAGO and DEMHA. Plaintiff was traveling eastbound on Washington Avenue,  
2 approaching Saylor Avenue, in the eastbound lanes. Plaintiff alleges Nakia McCloud, while in the  
3 course and scope of her employment with Defendant USA, in its Department of the Treasury, IRS,  
4 was also traveling eastbound on Washington Avenue, directly behind Plaintiff.

5 Plaintiff alleges to have stopped in the eastbound travel lane for pedestrians who were  
6 crossing Washington Avenue. Plaintiff avers that Nakia McCloud then rear-ended Plaintiff's  
7 vehicle.

8 Following the first collision, Nakia McCloud pulled her vehicle off to the right side of the  
9 road. Plaintiff's vehicle remained in the roadway. As Nakia McCloud was on the phone with  
10 emergency services, while Plaintiff sat in her disabled car, her vehicle was struck again by a  
11 different vehicle, driven by Defendant DEMHA SANTIAGO. Plaintiff further contends she was  
12 injured as a result of the September 1, 2016 motor vehicle collisions.

13 **B. Relief Sought**

14 Plaintiff seeks past medical specials in an amount in excess of \$1,661,262.05. Plaintiff is  
15 continuing her medical treatment. She is also seeking the present-day value of future medical  
16 expenses in the amount of \$386,938.00, loss of earning capacity in the amount of \$805,038.85, and  
17 past and future pain and suffering.

18 Plaintiff presented claims for future medical specials between \$1,504,780.00 and  
19 \$2,238,876.00 during discovery. Thereafter, Defendant USA filed a Motion to Strike Untimely  
20 Disclosure of Plaintiff's Expert's Life Care Plan Opinions, which was granted by the Court.

21 **C. Contentions of the Parties**

22 **1. Plaintiff's Contentions:**

23 Plaintiff contends that Defendants were the sole cause of the subject collisions by failing to  
24 pay full attention to their surroundings, failing to reduce their speed, and striking the rear of  
25 Plaintiff's vehicle. Plaintiff further contends that the motor vehicle collisions caused her significant  
26 injuries and the resulting damages that are the subject of this lawsuit.

27 **2. Defendant USA's Contentions:**

28

1           Defendant, USA contends that Plaintiff cannot establish her burden of proof as to causation  
 2 or damages (if any) as to the USA in the first accident

3           **3. Defendants DEMHA-SANTIAGO and DEMHA's Contentions:**

4           Defendants LICETH DEMHA-SANTIAGO and JUAN DEMHA ("Defendants") contend  
 5 that Defendant USA and Plaintiff are the sole and proximate cause of the subject incident and of  
 6 Plaintiff's alleged injuries and damages, i.e., both collisions. Nakia McCloud, while in the course  
 7 and scope of her employment with Defendant USA (in its Department of the Treasury, IRS), was  
 8 driving directly behind Plaintiff prior to the initial collision. As a result of McCloud's failure to pay  
 9 full attention to traffic in front of her, failure to keep a proper distance, and failure to reduce speed  
 10 pursuant to the traffic conditions ahead of her, McCloud drove her vehicle into the rear-end of  
 11 Plaintiff's vehicle. Following the initial collision, rather than exiting the roadway to her safety,  
 12 Plaintiff exited her vehicle, inspected it for damage, then re-entered her vehicle which remained  
 13 disabled in the roadway. While she remained in her vehicle, Plaintiff also failed to fasten her  
 14 seatbelt. As a result, Plaintiff's own negligent actions combined Defendant USA's initial collision,  
 15 caused the second collision to take place. Defendants contend that Plaintiff's claimed injuries and  
 16 damages are the result of Defendant USA and Plaintiff's negligence. Defendants further contend  
 17 that but for the collision caused by McCloud, these Defendants never would have been involved in  
 18 a collision with the Plaintiff.

19           **II.**

20           **Statement of Jurisdiction**

21           As against the United States, this Court has exclusive jurisdiction pursuant to 28 U.S.C.  
 22 §1346(b)(1), which provides that federal courts "shall have exclusive jurisdiction of civil actions  
 23 on claims against the United States... for injury or loss of property, or personal injury or death  
 24 caused by the negligent or wrongful act or omission of any employee of the Government while  
 25 acting within the scope of his office or employment, under circumstances where the United States,  
 26 if a private person, would be liable to the claimant in accordance with the law of the place where  
 27 the act or omission occurred."

1 III.  
2

3 **The following facts are admitted by the parties and require no proof:**  
4

- 5 1. Nakia McCloud was an employee of the Department of the Treasury, IRS, on  
6 September 1, 2016 and she was acting within the course and scope of her employment  
7 with the United States at the time of the motor vehicle accident.  
8
- 9 2. On September 1, 2016, Plaintiff WILSON was operating a 2005 Toyota Corolla,  
10 traveling eastbound on Washington Avenue, approaching Saylor Avenue, in Las Vegas,  
11 Nevada.  
12
- 13 3. On September 1, 2016, Nakia McCloud was operating a General Motors Terrain SLE,  
14 traveling eastbound on Washington Avenue.  
15
- 16 4. On September 1, 2016, Defendant DEMHA-SANTIAGO, was operating a 2006 Acura  
17 3.2 TL, traveling eastbound on Washington Avenue.  
18
- 19 5. The vehicle operated by Defendant DEMHA-SANTIAGO was owned by Defendant  
20 DEMHA.  
21
- 22 6. The front of Nakia McCloud's vehicle collided with the rear of Plaintiff WILSON's  
23 vehicle.  
24
- 25 7. The front of Defendant DEMHA-SANTIAGO's vehicle collided with the rear of  
26 Plaintiff WILSON's vehicle.  
27
- 28 8. The collision between DEMHA-SANTIAGO and Plaintiff did not occur until after  
McCloud's vehicle collided with the Plaintiff's vehicle.

29 IV.  
30

31 **The following facts, though not admitted, will not be contested at trial by evidence to  
32 the contrary:**  
33

34 None.  
35

36 V.  
37

38 **The following are Plaintiff's issues of fact to be tried and determined at trial:**  
39

- 40 1. Whether Nakia McCloud was negligent in her failure to operate her vehicle in a safe  
41

1 and reasonable manner at the time of the incident.

- 2 2. Whether Defendant USA is liable for Plaintiff's injuries in light of Nakia McCloud's  
3 breach of duty.
- 4 3. Whether Defendant DEMHA-SANTIAGO failed to operate her vehicle in a safe and  
5 reasonable manner at the time of the incident.
- 6 4. Whether Defendant JUAN DEMHA is liable for the subject collision by virtue of  
7 NRS 41.440.
- 8 5. Whether Defendant JUAN DEMHA negligently entrusted his vehicle to Defendant  
9 DEMHA-SANTIAGO.
- 10 6. Whether Plaintiff could have reasonably been expected to avoid the second collision  
11 pursuant to the Court's Order (ECF 113).
- 12 7. Whether the subject collisions proximately caused injuries to Plaintiff.
- 13 8. Whether the subject collisions proximately caused damages to Plaintiff.
- 14 9. Whether the medical treatment claimed was/is reasonable, necessary, and related to  
15 the alleged collisions.
- 16 10. Whether the Plaintiff will have future symptoms related to the alleged collisions.
- 17 11. Whether the Plaintiff will incur future treatments related to the alleged collisions.
- 18 12. Whether the Plaintiff suffered a loss of earning capacity related to the alleged  
19 collisions.
- 20 13. Whether the Plaintiff has mitigated her damages that she relates to the alleged  
21 collisions.
- 22 14. The monetary value of Plaintiff's damages, including pain and suffering, if any.

23 **The following are Defendant USA's issues of fact to be tried and determined at trial.**

- 24 1. Whether Plaintiff should have stopped at the intersection given that the  
25 pedestrians never entered the intersection and, even if they did, the pedestrians  
26 were not in immediate harm or danger given that they were on the other side of the  
27 street and nowhere near Plaintiff's vehicle.

- 1       2. Whether Plaintiff's exit and later re-entry of her own vehicle caused her to sustain
- 2            injuries due to the second accident.
- 3       3. Whether the United States is liable to Plaintiff and if so, to what extent.
- 4       4. Whether the United States' employee's actions caused Plaintiff's injuries (if any).
- 5       5. Whether and the extent to which Plaintiff was injured as a result of the first
- 6            accident involving the United States' employee.
- 7       6. Whether Plaintiff or any other party's negligence contributed to the accidents
- 8            and/or Plaintiff's injuries.

9           **The following are Defendants DEMHA-SANTIAGO, and DEMHA's issues of fact to be tried**  
10          **and determined at trial.**

- 11       1. Whether Nakia McCloud was negligent in her failure to operate her vehicle in a safe and
- 12            reasonable manner at the time of the incident.
- 13       2. Whether Defendant USA is liable for Plaintiff's injuries in light of Nakia McCloud's breach
- 14            of duty.
- 15       3. Whether Plaintiff failed to operate her vehicle in a safe and reasonable manner at the time
- 16            of the subject incident, at times preceding both collisions.
- 17       4. Whether Plaintiff contributed to the initial collisions occurrence, i.e. Plaintiff's degree of
- 18            fault for the collision between herself and McCloud.
- 19       5. Whether, after the first collision, Plaintiff contributed to the second collision's occurrence,
- 20            i.e. Plaintiff's degree of fault for the second collision between herself and Demha.
- 21       6. Whether the collision between Plaintiff and DEMHA-SANTIAGO would have occurred
- 22            but for the collision between Plaintiff and McCloud.
- 23       7. Whether Defendant JUAN DEMHA is liable for the subject collision by virtue of NRS
- 24            41.440.
- 25       8. Whether Defendant JUAN DEMHA negligently entrusted his vehicle to Defendant
- 26            DEMHA-SANTIAGO.
- 27       9. Whether Plaintiff could have reasonably been expected to avoid the second collision

1 pursuant to the Court's Order (ECF 113).

- 2 10. Whether Plaintiff assumed the risk of reentering her vehicle following the initial collision  
3 11. Whether the subject collisions proximately caused injuries to Plaintiff.  
4 12. Whether the subject collisions proximately caused damages to Plaintiff.  
5 13. Whether Plaintiff had preexisting conditions related to the body parts complained of  
6 resulting from the subject accident, and any apportionment thereof.  
7 14. Whether the medical treatment claimed was/is reasonable, necessary, and related to the  
8 alleged collisions.  
9 15. Whether the Plaintiff will have future symptoms related to the alleged collisions.  
10 16. Whether the Plaintiff will incur future treatments related to the alleged collisions.  
11 17. Whether the Plaintiff suffered a loss of earning capacity related to the alleged collisions.  
12 18. Whether the Plaintiff has mitigated her damages that she relates to the alleged collisions.  
13 19. The monetary value of Plaintiff's damages, including pain and suffering, if any.

14 **VI.**

15 (a) The following exhibits are stipulated into evidence in this case and may be so marked  
16 by the clerk:

17 See "**Exhibit A-1**" of this document..

18 (b) The parties agree the following exhibits will be available for use at the time of trial but  
19 are not currently admitted:

20 See "**Exhibit A**" of this document

21 (c) As to the following additional exhibits the parties propose the following:

22 **(1) Plaintiff's exhibits:**

23 See "**Exhibit B**" of this document.

24 Plaintiff reserves the right to use any documents disclosed by Defendants, including those  
25 which experts have reviewed and formed opinions, such as reports; pleadings; correspondence;  
26 notes and medical records and billing.

27 Plaintiff may use any and all writings, published works, journals, treatises, medical texts,  
28

1 affidavits, films, drawings, graphs, charts, photographs, reports, computer tapes, computer discs,  
 2 and other data compilations, and other medical reference materials which Plaintiff and/or Plaintiff's  
 3 expert(s) use in support of Plaintiff's allegations. By disclosing documents, Plaintiff does not waive  
 4 the right to challenge and exclude documents, or portions thereof, on any basis.

5 Plaintiff may offer documents needed for rebuttal or impeachment purposes, including, but  
 6 not limited to, discovery obtained during the course of litigation as permitted; pleadings; and other  
 7 documentation in accordance with admissible evidence. There may be additional exhibits which  
 8 Plaintiff may wish to offer at the time of trial, not listed above. When and if that determination is  
 9 made, notice will be given immediately and supplied to the Court and to Defendants.

10 **(1) Defendant USA's exhibits:**

11 See "Exhibit C" of this document.

12 Defendant reserves the right to use any document including but not limited to discovery  
 13 responses and/or deposition testimony by Plaintiff or co-defendants for impeachment and/or  
 14 substantively as party admissions, as may be relevant at trial. Defendant reserves the right to use  
 15 demonstrative evidence. Defendant also reserves the right to use any exhibit listed or introduced by  
 16 Plaintiff or co-defendants, or as previously produced by the parties.

17 **(1) Defendant DEMHA-SANTIAGO, and DEMHA's exhibits:**

18 See "Exhibit D" of this document.

19 Defendants reserve the right to use any discovery responses and/or deposition testimony by  
 20 any party for impeachment and/or substantively as party admissions, as may be relevant at trial.  
 21 Defendants reserve the right to use demonstrative evidence. Defendants also reserve the right to use  
 22 any exhibit listed or introduced by any party.

23 As to the medical records listed separately in the parties' list of exhibits, the parties were  
 24 unable to meet in person to review the same in light of the volume of records, Plaintiff's continued  
 25 treatment, and the time permitted to submit the Proposed Joint Pre-Trial Order. However, the parties  
 26 will endeavor to do so prior to trial and identify which portions of said records may be stipulated to  
 27 and which may not.

**(c) Electronic evidence:**

1. The parties may offer Power Point images/drawings/diagrams/animations/story boards depicting the facts and circumstance of the accident, information relevant to communications between the parties, and/or deposition testimony.

2. The parties do intend to present electronic evidence for purposes of jury deliberations.

**(d) Depositions:**

1. Plaintiff will offer the following deposition testimony at trial:

Deponent	Offered Testimony
Liceth Demha	10:24-11:20, 21:1-19, 22:18-23:4, 27:22-28:8, 28:24-31:16, 35:20-49:24, 52:16-53:15, 57:14-62:4
Nakia McCloud	12:21-13:14, 27:4-28:16, 32:8-34:11, 34:25-35:23, 39:8-47:20, 48:22-54:22, 57:15-62:22, 65:3-72:6, 73:14-75:25, 76:24-78:15, 83:17-85:6, 92:13-93:19, 96:9-96:14
Sonalolita Wilson	13:2-13:22, 15:3-15:10, 15:15-16:15, 17:4-17:12, 19:8-19:14, 19:20-22:23, 23:9-26:10, 27:7-29:18, 34:14-35:9, 35:25-38:10, 38:24-40:25, 42:5-54:1, 54:9-60:2, 65:5-66:18, 67:17-69:17, 71:6-75:23, 80:15-82:16, 86:8-88:3, 88:17-89:15, 89:25-90:13, 93:8-96:10, 97:10-101:20, 102:14-103:1, 105:18-106:18, 107:11-109:10, 109:25-111:12, 111:19-112:6, 112:19-119:4, 123:12-125:5, 125:20-135:15, 136:5-138:13
Baduk Ghuman	18:14 – 20:6, 21:9 – 22:22, 27:16 – 28:25, 30:8 – 33:11, 35:1-41:9, 44:9– 49:5, 49:6-50:8, 50:14-55:3, 55:5-56:1, 56:25-58:7, 59:2-60:23, 60:24-64:15, 64:16-67:9, 68:6-71:9, 75:11-76:25, 82:7-84:5, 84:11-88:18, 89:3-91:16, 94:19-96:12, 100:6-103:25, 108:7-110:22, 111:16-112:25, 113:21-115:25
Duff Kaster	15:3-15:22, 21:12-23:11, 24:9-25:1, 25:16-26:13, 26:24-27:12, 28:4-29:24, 32:21-33:23, 34:6-34:16, 35:1-35:18
Robert Hinton	10:4 – 11:15, 12:17 – 13:1, 14:7-15:4, 15:9-16:16, 16:20-17:12, 21:10-23:19, 24:12-25:12, 26:1-30:14, 31:1-32:2, 33:9-40:23
Mark Glyman	11:25-12:21, 14:10-15:1, 19:1-22:4, 22:18-23:16, 24:4-31:16, 33:3-33:20, 34:13-37:13, 37:20-41:16, 41:22-43:9, 44:1-44:23
Thomas Dunn	7:12-9:12, 19:13-20:16, 23:5-24:2, 25:4-25:22, 26:18-31:19, 33:20-35:10, 35:17-39:10, 39:21-44:20, 48:25-50:11, 52:20-55:5, 56:7-57:7, 57:20-60:2, 60:23-61:6, 61:21-62:20, 63:19-66:3, 66:14-67:19
Rick Chavez	10:16-11:6, 20:6-20:18, 22:21-24:22, 25:3-25:14, 29:16-31:21, 41:3-42:19, 45:9-46:1, 47:23-50:5, 51:1-53:9, 59:13-60:21, 63:14-63:25, 64:24-70:10, 71:10-72:24, 73:9-74:14, 75:25-76:17, 77:17-78:12, 79:1-81:14, 82:8-83:2, 84:13-86:9, 87:6-87:24, 94:19-96:9, 102:21-103:19, 106:7-107:10, 108:17-109:18, 110:1-112:2, 114:9-118:17
Kim Balogh	12:24-14:4, 18:3-19:2, 19:11-20:24, 22:4-25:20, 26:22-29:15, 30:9-33:5, 33:14-33:23

1	David John Oliveri	11:24-14:2, 14:14-15:15, 16:25-17:16, 20:1-20:16, 24:4-24:25, 26:2-26:24, 28:3-28:10, 30:3-30:17, 31:14-32:4, 32:17-36:1, 36:7-37:14, 37:22-42:1, 42:15-43:15, 44:2-45:7, 49:7-50:7, 51:8-51:16, 52:19-53:5, 53:18-54:14, 55:19-57:12, 57:21-58:20, 61:3-62:3, 64:14-64:22, 65:11-66:21, 71:8-73:5, 77:6-77:13, 77:19-78:5
2	Robert Simmons	13:3-13:15, 14:24-15:4, 19:21-20:14, 23:3-25:10, 28:3-29:11, 30:6-31:9, 34:25-37:8, 38:24-39:22, 41:10-42:14
3	Jaswinder Grover	11:23-13:13, 17:6-17:22, 20:5-21:8, 21:21-22:13, 23:1-24:11, 25:2-27:18, 29:18-31:3, 32:3-33:1, 35:18-38:21, 39:2-41:20, 43:2-43:6, 44:16-48:25, 49:1-49:25, 50:8-52:5, 53:3-55:14, 59:5-61:4, 62:10-64:7, 66:2-68:17, 70:4-74:6, 74:23-76:9, 77:7-78:15, 80:3-81:25, 84:11-85:3, 89:4-93:12, 94:6-94:13, 94:14-96:18, 96:21-97:14, 98:3-102:14, 104:7-105:16, 106:6-111:21
4	Sonalolita Wilson pt. II	157:1-164:11, 170:8-180:1, 182:14-183:8, 184:2-185:5, 185:6-186:17, 187:18-191:4, 191:15-192:8, 196:23-198:7, 201:8-202:7, 205:1-207:17, 209:24-217:17, 218:22-220:11, 222:1-223:20, 225:3-227:8, 233:14-236:15, 237:14-239:14, 241:7-245:4, 248:3-249:4

Plaintiff anticipates reading depositions into the records and reserve the right to use all depositions which have been conducted in this action due to witness unavailability, if allowed under FRCP 32(a)(4)(B), to refresh recollection and/or to impeach a witness, as well as any other permitted use under the Federal Rules of Civil Procedure or the Federal Rules of Evidence.

2. Defendant USA does not intend, at this time to offer page and line designations for any deposition transcripts. In the event Defendant USA learns that a witness is unavailable to testify at trial, Defendant USA will notify all parties and the Court of page and line designations of the unavailable witness's deposition transcript to offer at trial. Defendant USA reserves the right to use all depositions which have been conducted in this action to refresh recollection and/or to impeach a witness, and otherwise use at trial in accordance with the applicable rules, *i.e.*, Fed. R. Civ. P. 32; Fed. R. Evid. 801(d).

3. Defendants DEMHA-SANTIAGO, and DEMHA will offer the following depositions:

Deponent	Offered Testimony
Liceth Demha	10:5-11:20, 15:7-8, 17:7-21, 20:9-13, 20:20-25, 23:15-16, 24:11-16, 27:22-28:8, 28:24-31:7, 35:20-36:12, 40:14-16, 47:14-19, 52:16-53:15, 54:20-25, 57:14-23, 58:14-20, 59:23-60:5, 61:16-20
Nakia McCloud	12:21-13:14, 24:14-25:1, 27:4-28:16, 30:20-31:5, 32:8-34:11, 34:25-35:23, 36:5-7, 39:8-47:20, 48:22-54:22, 55:4-56:13, 57:15-62:22, 65:3-72:6, 73:14-75:25, 76:24-78:15, 80:5-18, 81:10-25, 83:17-85:6, 87:9-

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	24, 89:15-25, 93:4-17, 96:9-96:14
1	Sonalolita Wilson 8:2-14, 11:8-22, 13:2-13:14, 15:3-16:15, 18:5-19:7, 19:20-21:11, 21:18-22:13, 24:1-12, 27:7-29:18, 35:25-38:10, 38:24-54:1, 59:14-24, 60:10-61:5, 65:5-66:20, 66:19-25, 67:10-12, 89:21-90:9, 90:20-91:8, 97:2-109:10, 112:24-113:4, 113:5-113:13, 119:8-119:13, 128:15-17, 131:3-14, 136:14-137:2, 137:17-25,
2	Babuk Ghuman 9:8-17, 9:18-11:7, 11:13-24, 15:14-25, 16:1-7, 17:19-18:2, 21:9-22:24, 24:13-23, 27:16 – 28:25, 30:8 – 33:11, 34:3-19, 35:1-41:9, 47:2-24, 48:7-18, 49:6-50:8, 50:14-55:3, 60:1-23, 62:2-25, 63:8-14, 67:6-9, 68:19-69:2, 80:5-12, 87:15-19, 91:14-23, 94:5-11, 100:9-18, 112:11-25, 113:8-13
3	Duff Kaster 6:8-7:10, 7:11-22, 10:23-11:25, 15:23-16:10, 18:12-19:1, 21:12-15, 24:9-18, 28:4-7, 32:1-7
4	Robert Hinton 7:2-13, 9:6-16, 10:4 – 11:23, 12:17 – 13:1, 13:14-17:12, 18:21-19:22, 21:10-24, 23:1-9, 26:1-7, 28:17-29:21, 31:1-9,
5	Mark Glyman 6:3-7:25, 8:13-15, 10:1-11:24, 13:7-10, 14:10-19, 16:11-17:9, 19:4-20:25, 21:8-22:4, 24:4-9, 30:1-31:16, 37:20-25
6	Thomas Dunn 6:12-7:23, 9:14-22, 10:8-23, 12:2-7, 18:3-19:5, 19:13-20:16, 23:5-24:2, 37:10-17, 42:8-43:24, 45:17-47:5, 50:3-11, 60:3-21, 60:23-61:6,
7	Rick Chavez 5:7-16, 21:1-3, 26:4-6, 28:3-10, 40:15-41:5, 44:3-45:8, 56:3-6, 59:6-7, 61:10-62:6, 62:18-63:1, 64:5-20, 65:8-15, 67:4-68:25, 69:1-5, 71:10-21, 72:2-14, 73:17-23, 74:15-22, 77:5-12, 84:13-21, 85:1-17, 86:1-9, 88:16-17, 90:5-9, 96:4, 105:4-5, 111:3-19, 114:16-115:22, 119:22-120:1, 120:20-121:2
8	Kim Balogh 7:19-18:2, 12:4-13:8, 18:22-19:2, 24:9-25:9, 25:21-26:21, 28:7-13, 28:22-29:2, 30:24-31:19, 32:14-33:23
9	David John Olivieri 7:25-9:25, 10:14-21, 11:12-24, 12:1-13:12, 14:9-15:6, 15:7-18, 15:23 16:3, 16:4-24, 17:17-21, 18:4-19:3, 20:1-21, 21:2-22:16, 23:18-24:25, 25:4-26:24, 27:3-28:10, 29:24-30:14, 31:3-32:14, 32:22-33:20, 34:4-36:1, 36:7-37:14, 39:1-21, 39:23-42:1, 42:15-43:2, 44:1-5, 44:7-45:7, 45:19-46:5, 47:3-23, 51:1-16, 55:19-56:8, 57:21-58:4, 58:10-20, 58:21 59:22, 60:1-9, 60:14-61:22, 64:4-22, 65:25-66:16, 66:17-67:2, 67:3 68:13, 68:14-22, 68:23-69:1, 69:18-70:13, 71:11-14, 77:22-79:23
10	Robert Simmons 7:15-19, 8:6-8, 11:7-13, 13:10-15, 14:9-13, 14:25-15:2, 16:6-17:1, 17:9-16, 18:12-19:11, 20:4-20:22, 21:3-6, 24:1-25:2, 26:10 27:8, 28:3-23, 29:20-30:18, 31:5-25, 32:4-17, 34:25-36:7, 36:8-25, 37:1-8, 38:24-39:17, 41:10-25
11	Jaswinder Grover 8:19-21, 12:15-13:13, 20:5-8, 21:18-20, 23:1-24:11, 26:22-27:18, 29:18-30:13, 33:2-3, 35:18-11, 36:22-37:1, 38:7-21, 39:2-41:20, 44:3-5, 45:10-19, 46:13-47:24, 48:12-25, 50:8-19, 56:2-7, 56:16-22, 58:7-25, 63:13-23, 64:17-66:1, 67:3-68:6, 69:1-24, 71:11-72:23, 74:20-76:9, 80:8-19, 84:2-16, 88:2-19, 89:2-17, 90:16-91:22, 94:14-95:18, 96:2-18, 97:2-22, 98:3-99:8, 99:9-100:18, 102:16-103:20, 103:21-104:3, 104:10-105:9, 105:10-12, 106:4-107:9, 107:11-108:1, 108:2-9,
12	Sonalolita Wilson pt. 148:16-25, 150:22-151:16, 152:1-7, 155:6-25, 157:1-164:11, 164:21-

1	II	170:13, 172:22-25, 174:1-8, 174:17-23, 175:13-25, 176:16-177:7, 177:11-21, 180:19-22, 182:14-183:8, 185:6-186:12, 189:7-190:19, 192:2-8, 192:25-193:6, 201:9-15, 205:1-22, 213:7-14, 213:18-22, 214:9-14, 217:5-25, 225:3-12, 238:19-239:11, 243:5-244:6, 248:11-24
2	Frank Perez	Plaintiff is in the process of obtaining his deposition transcript and will supplement at a later date.

5                   Defendants anticipate reading depositions into the records and reserve the right to use all  
6 depositions which have been conducted in this action due to witness unavailability, if allowed under  
7 FRCP 32(a)(4)(B), to refresh recollection and/or to impeach a witness, as well as any other  
8 permitted use under the Federal Rules of Civil Procedure or the Federal Rules of Evidence.

9                   **(f) Objections to Depositions:**

10                  (1) Plaintiff objects to Defendant USA's depositions as follows:

11                  Plaintiff reserves the right to object to any particular portions of the deposition transcript(s),  
12 including, without limitation, if and/or when Defendant USA provides them.

13                  (2) Plaintiff objects to Defendant DEMHA-SANTIAGO, and DEMHA's depositions as follows:

Deponent	Offered Testimony	Plaintiff's Objections
Liceth Demha	10:5-11:20, 15:7-8, 17:7-21, 20:9-13, 20:20-25, 23:15-16, 24:11-16, 27:22- 28:8, 28:24-31:7, 35:20-36:12, 40:14-16, 47:14-19, 52:16-53:15, 54:20-25, 57:14- 23, 58:14-20, 59:23-60:5, 61:16-20	17:7 – 21 – Relevance 20:20 – 25 – Relevance 54:20 – 25 – Relevance
Nakia McCloud	12:21-13:14, 24:14-25:1, 27:4-28:16, 30:20-31:5, 32:8-34:11, 34:25-35:23, 36:5-7, 39:8-47:20, 48:22-54:22, 55:4- 56:13, 57:15-62:22, 65:3-72:6, 73:14- 75:25, 76:24-78:15, 80:5-18, 81:10-25, 83:17-85:6, 87:9-24, 89:15-25, 93:4-17, 96:9-96:14	24:14 – 18 – Relevance 30:20 – 31:5 – Speculation 34:25 – 35:23 – Relevance
Sonalolita Wilson	8:2-14, 11:8-22, 13:2-13:14, 15:3-16:15, 18:5-19:7, 19:20-21:11, 21:18-22:13, 24:1-12, 27:7-29:18, 35:25-38:10, 38:24- 54:1, 59:14-24, 60:10-61:5, 65:5-66:20, 66:19-25, 67:10-12, 89:21-90:9, 90:20- 91:8, 97:2-109:10, 112:24-113:4, 113:5- 113:13, 119:8-119:13, 128:15-17, 131:3- 14, 136:14-137:2, 137:17-25,	27:7 – 28:23 – Relevance; more prejudicial than probative  60:10 – 61:5 – Relevance; attorney client privilege; more prejudicial than probative
Babuk Ghuman	9:8-17, 9:18-11:7, 11:13-24, 15:14-25, 16:1-7, 17:19-18:2, 21:9-22:24, 24:13-	11:13 – 24 – Relevance

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	23, 27:16 – 28:25, 30:8 – 33:11, 34:3-19, 35:1-41:9, 47:2-24, 48:7-18, 49:6-50:8, 50:14-55:3, 60:1-23, 62:2-25, 63:8-14, 67:6-9, 68:19-69:2, 80:5-12, 87:15-19, 91:14-23, 94:5-11, 100:9-18, 112:11-25, 113:8-13	47:2 – 24 – Misrepresents facts in evidence; speculation  48:7 – 18 – Relevance; more prejudicial than probative  62:2 – 63:14 – Speculation; Relevance; Assumes facts not in evidence  112:11 – 25 – Misrepresents facts in evidence; speculation  Plaintiff objects to any hypothetical questions not based in evidence as to the causation of Plaintiff's injuries.	
11 12 13 14 15	Duff Kaster	6:8-7:10, 7:11-22, 10:23-11:25, 15:23-16:10, 18:12-19:1, 21:12-15, 24:9-18, 28:4-7, 32:1-7	32:1 – 7 – Misrepresents the witness' testimony; vague  Plaintiff objects to any hypothetical questions not based in evidence as to the causation of Plaintiff's injuries.
16 17	Robert Hinton	7:2-13, 9:6-16, 10:4 – 11:23, 12:17 – 13:1, 13:14-17:12, 18:21-19:22, 21:10-24, 23:1-9, 26:1-7, 28:17-29:21, 31:1-9,	
18 19 20 21 22	Mark Glyman	6:3-7:25, 8:13-15, 10:1-11:24, 13:7-10, 14:10-19, 16:11-17:9, 19:4-20:25, 21:8-22:4, 24:4-9, 30:1-31:16, 37:20-25	13:7 – 10 – Relevance  14:10 – 19 – Relevance  Plaintiff objects to any hypothetical questions not based in evidence as to the causation of Plaintiff's injuries.
23 24 25 26 27 28	Thomas Dunn	6:12-7:23, 9:14-22, 10:8-23, 12:2-7, 18:3-19:5, 19:13-20:16, 23:5-24:2, 37:10-17, 42:8-43:24, 45:17-47:5, 50:3-11, 60:3-21, 60:23-61:6,	18:3 – 19:5 – Relevance  42:8 – 43:24 – Speculation; improper hypothetical  60:3 – 21 – Relevance  Plaintiff objects to any hypothetical questions not based

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		in evidence as to the causation of Plaintiff's injuries.	
1	Rick Chavez	5:7-16, 21:1-3, 26:4-6, 28:3-10, 40:15-41:5, 44:3-45:8, 56:3-6, 59:6-7, 61:10-62:6, 62:18-63:1, 64:5-20, 65:8-15, 67:4-68:25, 69:1-5, 71:10-21, 72:2-14, 73:17-23, 74:15-22, 77:5-12, 84:13-21, 85:1-17, 86:1-9, 88:16-17, 90:5-9, 96:4, 105:4-5, 111:3-19, 114:16-115:22, 119:22-120:1, 120:20-121:2	
2	Kim Balogh	7:19-18:2, 12:4-13:8, 18:22-19:2, 24:9-25:9, 25:21-26:21, 28:7-13, 28:22-29:2, 30:24-31:19, 32:14-33:23	
3	David John Oliveri	7:25-9:25, 10:14-21, 11:12-24, 12:1-13:12, 14:9-15:6, 15:7-18, 15:23 16:3, 16:4-24, 17:17-21, 18:4-19:3, 20:1-21, 21:2-22:16, 23:18-24:25, 25:4-26:24, 27:3-28:10, 29:24-30:14, 31:3-32:14, 32:22-33:20, 34:4-36:1, 36:7-37:14, 39:1-21, 39:23-42:1, 42:15-43:2, 44:1-5, 44:7-45:7, 45:19-46:5, 47:3-23, 51:1-16, 55:19-56:8, 57:21-58:4, 58:10-20, 58:21 59:22, 60:1-9, 60:14-61:22, 64:4-22, 65:25-66:16, 66:17-67:2, 67:3 68:13, 68:14-22, 68:23-69:1, 69:18-70:13, 71:11-14, 77:22-79:23	10:14 – 21 – Relevance 18:4 – 19:3 – Relevance 27:3 – 28:10 – Speculation 42:15 – 43:2 – Speculation  67:3 – 68:13 – Relevance; violation of the collateral source rule  77:22 – 79:23 – Speculation  Plaintiff objects to any hypothetical questions not based in evidence as to the causation of Plaintiff's injuries.
4	Robert Simmons	7:15-19, 8:6-8, 11:7-13, 13:10-15, 14:9-13, 14:25-15:2, 16:6-17:1, 17:9-16, 18:12-19:11, 20:4-20:22, 21:3-6, 24:1-25:2, 26:10 27:8, 28:3-23, 29:20-30:18, 31:5-25, 32:4-17, 34:25-36:7, 36:8-25, 37:1-8, 38:24-39:17, 41:10-25	24:1 – 25:2 – Speculation  29:20 – 32:17 – Speculation; misstates facts in evidence; improper hypothetical  36:8 – 25 – Speculation  41:10 – 25 – Relevance
5	Jaswinder Grover	8:19-21, 12:15-13:13, 20:5-8, 21:18-20, 23:1-24:11, 26:22-27:18, 29:18-30:13, 33:2-3, 35:18-11, 36:22-37:1, 38:7-21, 39:2-41:20, 44:3-5, 45:10-19, 46:13-47:24, 48:12-25, 50:8-19, 56:2-7, 56:16-22, 58:7-25,	63:13-23 and 64:17 – 66:1 – Relevance; speculation

1		63:13-23, 64:17-66:1, 67:3-68:6, 69:1- 24, 71:11-72:23, 74:20-76:9, 80:8-19, 84:2-16, 88:2-19, 89:2-17, 90:16-91:22, 94:14-95:18, 96:2-18, 97:2-22, 98:3- 99:8, 99:9-100:18, 102:16-103:20, 103:21-104:3, 104:10-105:9, 105:10-12, 106:4-107:9, 107:11-108:1, 108:2-9,	
5	Sonalolita Wilson pt. II	148:16-25, 150:22-151:16, 152:1-7, 155:6-25, 157:1-164:11, 164:21-170:13, 172:22-25, 174:1-8, 174:17-23, 175:13- 25, 176:16-177:7, 177:11-21, 180:19-22, 182:14-183:8, 185:6-186:12, 189:7- 190:19, 192:2-8, 192:25-193:6, 201:9- 15, 205:1-22, 213:7-14, 213:18-22, 214:9-14, 217:5-25, 225:3-12, 238:19- 239:11, 243:5-244:6, 248:11-24	157:1 – 164:11 – Relevance 164:21 – 170:13 – Relevance 185:6 – 186:12 – Relevance 189:7 – 190:19 – Relevance  192:25 – 193:6 – Relevance; hearsay  201:21 – 24 -- Relevance 205:1 – 22 – Relevance

11  
12 (3) Defendant USA objects to plaintiff's depositions as follows:

13       a. Plaintiff WILSON's depositions: All testimony.

14       b. David John Oliveri's deposition: All testimony; including, without limitation, to any  
15 testimony related to David John Oliveri's life care plan and future medical treatments as struck by  
16 the Court. *See* ECF No. 90.

17       c. To the extent Plaintiff intends to call Defendant USA's expert witnesses and present their  
18 deposition testimony in her case-in-chief, Defendant USA objects to: All Plaintiff's proposed  
19 testimony of Defendant USA's expert witnesses; including, without limitation, to Rick Chavez and  
20 Kimberly Balough's testimony.

21       Defendant, USA reserves the right to object to any particular portions of the other deposition  
22 transcripts, including, without limitation, those provided by Plaintiff and Defendants DEHMA-  
23 SANTIAGO and DEMHA's inclusions in this order. Furthermore, USA joins as to co-defendant  
24 DEMHA-SANTIAGO's objections to Plaintiff's depositions as noted in subsection (4) below. USA  
25 further objects to the extent that either Plaintiff or co-defendants seek to introduce or use any  
26 deposition transcript at trial beyond that allowed under Federal Rules of Civil Procedure and/or the  
27 Federal Rules of Evidence.

(4) The United States objects to Defendants DEMHA-SANTIAGO and DEMHA's deposition page, line designations as follows:

Deponent	Offered Testimony
Liceth Demha	10:5-11:20 (relevance; prejudicial; calls for speculation; incomplete hypothetical; expert opinion) 20:20-25 (relevance; prejudicial; character evidence)
Nakia McCloud	12:21-13:14 (relevance; prejudicial; calls for speculation; incomplete hypothetical; expert opinion) 27:4-28:16 (relevance) 30:20-31:5 (relevance) 34:25-35:23 (relevance; prejudicial; character evidence) 36:5-7 (relevance, confusion of issues) 39:8-47:20 (relevance; legal conclusion) 55:4-56:13 (relevance; prejudice; hearsay; best evidence rule) 57:15-62:22 (relevance; prejudice; hearsay; best evidence rule) 76:24-78:15 (relevance; hearsay; best evidence rule) 80:5-18 (relevance; prejudice; legal conclusion; best evidence rule) 81:10-25 (relevance; prejudice; legal conclusion; calls for speculation) 83:17-85:6 (relevance; prejudice; hypothetical to lay witness; legal conclusion; calls for speculation) 89:15-25 (relevance; prejudice; testimony by counsel)
Sonalolita Wilson	24:1-12 (legal conclusion, expert opinion) 119:8-119:13 (hearsay)
Babuk Ghuman	9:18-11:7 (relevance) 15:14-25 (relevance) 62:2-25 (relevance; best evidence rule) 67:6-9 (relevance; best evidence rule) 87:15-19 (relevance) 113:8-13 (relevance)
Duff Kaster	6:8-7:10 (relevance) 10:23-11:25 (relevance)
Robert Hinton	13:14-17:12 (object to 16:9-16 on grounds of relevance, prejudice, self-serving hearsay, legal conclusion)
Mark Glyman	6:3-7:25 (relevance) 10:1-11:24 (relevance; best evidence rule); 13:7-10 (relevance; prejudicial) 24:4-9 (relevance; foundation)
Thomas Dunn	60:3-21 (relevance; hearsay; counsel testifying)
Rick Chavez	5:7-16 (relevance; foundation; best evidence rule) 28:3-10 (relevance) 40:15-41:5 (relevance) 44:3-45:8 (relevance; best evidence rule) 56:3-6 (relevance)

	59:6-7 (incomplete hypothetical; relevance) 64:5-20 (testimony by counsel)
Kim Balogh	30:24-31:19 (relevance; incomplete hypothetical; foundation) 32:14-33:23 (incomplete/improper hypothetical; foundation)
David John Olivieri	11:12-24 (relevance) 15:23 16:3 (relevance; foundation; 702) 34:4-36:1 (relevance; speculation) 69:18-70:13 (relevance; foundation; 702) 77:22-79:23 (relevance; foundation; 702)
Robert Simmons	7:15-19 (relevance) 11:7-13 (relevance) 17:9-16 (relevance) 24:1-25:2 (hearsay)
Jaswinder Grover	21:18-20 (relevance) 44:3-5 (relevance; foundation)
Sonalolita Wilson pt. II	243:5-244:6 (hearsay; legal conclusion)

(5) Defendant DEMHA-SANTIAGO, and DEMHA object to plaintiff's depositions as follows:

Deponent	Offered Testimony
Liceth Demha	10:24-11:20, (calls for speculation; incomplete hypothetical; expert opinion) 21:1-19, (relevance; prejudicial) 22:18-23:4, (relevance) 27:22-28:8, (relevance) 28:24-31:16, (relevance; assumption) 35:20-49:24, (relevance; expert opinion) 57:14-62:4 (relevance; expert opinion)
Nakia McCloud	39:8-47:20, (expert opinion) 83:17-85:6, (incomplete hypothetical; calls for speculation; expert opinion) 92:13-93:19, (calls for legal conclusion; expert opinion)
Sonalolita Wilson	13:2-13:22, (relevance, prejudicial, expert opinion) 19:8-19:14, (relevance) 23:9-26:10, (expert opinion) 38:24-40:25, (expert opinion) 42:5-54:1, (relevance, expert opinion) 54:9-60:2, (relevance, expert opinion, best evidence rule) 71:6-75:23, (expert opinion, best evidence rule) 80:15-82:16, (relevance, prejudicial) 86:8-88:3, (relevance, expert opinion, prejudicial, best evidence rule) 88:17-89:15, (relevance, expert opinion, prejudicial, best evidence rule) 89:25-90:13, (relevance, expert opinion, prejudicial, best evidence rule) 93:8-96:10, (relevance, expert opinion, prejudicial, best evidence rule) 102:14-103:1, (relevance, prejudicial, best evidence rule) 105:18-106:18, (relevance, prejudicial) 107:11-109:10, (relevance, prejudicial) 109:25-111:12, (relevance, prejudicial, best evidence rule)

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	112:19-119:4, (relevance, prejudicial, best evidence rule) 125:20-135:15, (relevance, prejudicial, best evidence rule) 136:5-138:13 (relevance, prejudicial, best evidence rule)
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Baduk Ghuman 18:14 – 20:6, (relevance, prejudicial) 21:9 – 22:22, (relevance, prejudicial) 27:16 – 28:25, (relevance, prejudicial, best evidence rule) 35:1-41:9, (relevance, prejudicial, best evidence rule) 44:9– 49:5, (relevance, prejudicial, best evidence rule) 50:14-55:3, (relevance, prejudicial, best evidence rule) 55:5-56:1, (relevance, prejudicial, best evidence rule) 56:25-58:7, (relevance, prejudicial, best evidence rule) 59:2-60:23, (relevance, prejudicial, best evidence rule) 60:24-64:15, (relevance, prejudicial, best evidence rule) 64:16-67:9, (relevance, prejudicial, best evidence rule) 68:6-71:9, (relevance, prejudicial, best evidence rule) 75:11-76:25, (relevance, prejudicial, best evidence rule) 82:7-84:5, (relevance, prejudicial, best evidence rule) 84:11-88:18, (relevance, prejudicial, best evidence rule) 89:3-91:16, (relevance, prejudicial, best evidence rule) 94:19-96:12, (relevance, prejudicial, best evidence rule) 100:6-103:25, (relevance, prejudicial, best evidence rule) 108:7-110:22, (relevance, prejudicial, best evidence rule) 111:16-112:25, (relevance, prejudicial, best evidence rule) 113:21-115:25 (relevance, prejudicial, best evidence rule)
Duff Kaster	15:3-15:22, (relevance, prejudicial, best evidence rule) 21:12-23:11, (relevance, prejudicial, best evidence rule) 24:9-25:1, (relevance, prejudicial, best evidence rule) 25:16-26:13, (relevance, prejudicial, best evidence rule) 26:24-27:12, (relevance, prejudicial, best evidence rule) 28:4-29:24, (relevance, prejudicial, best evidence rule) 32:21-33:23, (relevance, prejudicial, best evidence rule) 34:6-34:16, (relevance, prejudicial, best evidence rule) 35:1-35:18(relevance, prejudicial, best evidence rule)
Robert Hinton	21:10-23:19, (relevance, prejudicial, best evidence rule) 24:12-25:12, (relevance, prejudicial, expert opinion, best evidence rule) 26:1-30:14, (relevance, prejudicial, expert opinion, best evidence rule) 31:1-32:2, (relevance, prejudicial, expert opinion, best evidence rule) 33:9-40:23(relevance, prejudicial, expert opinion, best evidence rule)
Mark Glyman	11:25-12:21, (relevance, prejudicial, best evidence rule) 14:10-15:1, (relevance, prejudicial, best evidence rule) 19:1-22:4, (relevance, prejudicial, best evidence rule) 22:18-23:16, (relevance, prejudicial, best evidence rule) 24:4-31:16, (relevance, prejudicial, best evidence rule) 33:3-33:20, (relevance, prejudicial, best evidence rule) 34:13-37:13, (relevance, prejudicial, best evidence rule) 37:20-41:16, (relevance, prejudicial, best evidence rule) 41:22-43:9, (relevance, prejudicial, expert opinion, best evidence rule)

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1		44:1-44:23(relevance, prejudicial, expert opinion, best evidence rule)
2	Thomas Dunn	25:4-25:22, (relevance, prejudicial, best evidence rule) 26:18-31:19, (relevance, prejudicial, best evidence rule) 33:20-35:10, (relevance, prejudicial, best evidence rule) 35:17-39:10, (relevance, prejudicial, best evidence rule) 39:21-44:20, (relevance, prejudicial, best evidence rule) 48:25-50:11, (relevance, prejudicial, best evidence rule) 52:20-55:5, (relevance, prejudicial, best evidence rule) 56:7-57:7, (relevance, prejudicial, best evidence rule) 57:20-60:2, (relevance, prejudicial, best evidence rule) 60:23-61:6, (relevance, prejudicial, best evidence rule) 61:21-62:20, (relevance, prejudicial, best evidence rule) 63:19-66:3, (relevance, prejudicial, best evidence rule) 66:14-67:19(relevance, prejudicial, best evidence rule)
3	Rick Chavez	10:16-11:6, (relevance, prejudicial, best evidence rule) 20:6-20:18, (relevance, prejudicial, best evidence rule) 22:21-24:22, (relevance, prejudicial, best evidence rule) 25:3-25:14, (relevance, prejudicial, best evidence rule) 29:16-31:21, (relevance, prejudicial, best evidence rule) 41:3-42:19, (relevance, prejudicial, best evidence rule) 45:9-46:1, (relevance, prejudicial, best evidence rule) 47:23-50:5, (relevance, prejudicial, best evidence rule) 51:1-53:9, (relevance, prejudicial, best evidence rule) 59:13-60:21, (relevance, prejudicial, best evidence rule) 63:14-63:25, (relevance, prejudicial, best evidence rule) 64:24-70:10, (relevance, prejudicial, best evidence rule) 71:10-72:24, (relevance, prejudicial, best evidence rule) 73:9-74:14, (relevance, prejudicial, best evidence rule) 75:25-76:17, (relevance, prejudicial, best evidence rule) 77:17-78:12, (relevance, prejudicial, best evidence rule) 79:1-81:14, (relevance, prejudicial, best evidence rule) 82:8-83:2, (relevance, prejudicial, best evidence rule) 84:13-86:9, (relevance, prejudicial, best evidence rule) 87:6-87:24, (relevance, prejudicial, best evidence rule) 94:19-96:9, (relevance, prejudicial, best evidence rule) 102:21-103:19, (relevance, prejudicial, best evidence rule) 106:7-107:10, (relevance, prejudicial, best evidence rule) 108:17-109:18, (relevance, prejudicial, best evidence rule) 110:1-112:2, (relevance, prejudicial, best evidence rule) 114:9-118:17(relevance, prejudicial, best evidence rule)
4	Kim Balogh	12:24-14:4, (relevance, prejudicial, speculative, best evidence rule) 18:3-19:2, (relevance, prejudicial, speculative, best evidence rule) 19:11-20:24, (relevance, prejudicial, speculative, best evidence rule) 22:4-25:20, (relevance, prejudicial, speculative, best evidence rule) 26:22-29:15, (relevance, prejudicial, speculative, best evidence rule) 30:9-33:5, (relevance, prejudicial, speculative, best evidence rule) 33:14-33:23 (relevance, prejudicial, speculative, best evidence rule)

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1	David Olivieri	John	11:24-14:2, (relevance, prejudicial, best evidence rule) 14:14-15:15, (relevance, prejudicial, best evidence rule) 16:25-17:16, (relevance, prejudicial, best evidence rule) 20:1-20:16, (relevance, prejudicial, best evidence rule) 24:4-24:25, (relevance, prejudicial, best evidence rule) 26:2-26:24, (relevance, prejudicial, best evidence rule) 28:3-28:10, (relevance, prejudicial, best evidence rule) 30:3-30:17, (relevance, prejudicial, best evidence rule) 31:14-32:4, (relevance, prejudicial, best evidence rule) 32:17-36:1, (relevance, prejudicial, best evidence rule) 36:7-37:14, (relevance, prejudicial, best evidence rule) 37:22-42:1, (relevance, prejudicial, best evidence rule) 42:15-43:15, (relevance, prejudicial, best evidence rule) 44:2-45:7, (relevance, prejudicial, best evidence rule) 49:7-50:7, (relevance, prejudicial, best evidence rule) 51:8-51:16, (relevance, prejudicial, best evidence rule) 52:19-53:5, (relevance, prejudicial, best evidence rule) 53:18-54:14, (relevance, prejudicial, best evidence rule) 55:19-57:12, (relevance, prejudicial, best evidence rule) 57:21-58:20, (relevance, prejudicial, best evidence rule) 61:3-62:3, (relevance, prejudicial, best evidence rule) 64:14-64:22, (relevance, prejudicial, best evidence rule) 65:11-66:21, (relevance, prejudicial, best evidence rule) 71:8-73:5, (relevance, prejudicial, best evidence rule) 77:6-77:13, (relevance, prejudicial, best evidence rule) 77:19-78:5(relevance, prejudicial, best evidence rule)
16	Robert Simmons		13:3-13:15, (relevance, prejudicial, best evidence rule) 14:24-15:4, (relevance, prejudicial, best evidence rule) 19:21-20:14, (relevance, prejudicial, best evidence rule) 23:3-25:10, (relevance, prejudicial, best evidence rule) 28:3-29:11, (relevance, prejudicial, best evidence rule) 30:6-31:9, (relevance, prejudicial, best evidence rule) 34:25-37:8, (relevance, prejudicial, best evidence rule) 38:24-39:22, (relevance, prejudicial, best evidence rule) 41:10-42:14(relevance, prejudicial, best evidence rule)
21	Jaswinder Grover		11:23-13:13, (relevance, prejudicial, best evidence rule) 17:6-17:22, (relevance, prejudicial, best evidence rule) 20:5-21:8, (relevance, prejudicial, best evidence rule) 21:21-22:13, (relevance, prejudicial, best evidence rule) 23:1-24:11, (relevance, prejudicial, best evidence rule) 25:2-27:18, (relevance, prejudicial, best evidence rule) 29:18-31:3, (relevance, prejudicial, best evidence rule) 32:3-33:1, (relevance, prejudicial, best evidence rule) 35:18-38:21, (relevance, prejudicial, best evidence rule) 39:2-41:20, (relevance, prejudicial, best evidence rule) 43:2-43:6, (relevance, prejudicial, best evidence rule) 44:16-48:25, (relevance, prejudicial, best evidence rule)

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	49:1-49:25, (relevance, prejudicial, best evidence rule) 50:8-52:5, (relevance, prejudicial, best evidence rule) 53:3-55:14, (relevance, prejudicial, best evidence rule) 59:5-61:4, (relevance, prejudicial, best evidence rule) 62:10-64:7, (relevance, prejudicial, best evidence rule) 66:2-68:17, (relevance, prejudicial, best evidence rule) 70:4-74:6, (relevance, prejudicial, best evidence rule) 74:23-76:9, (relevance, prejudicial, best evidence rule) 77:7-78:15, (relevance, prejudicial, best evidence rule) 80:3-81:25, (relevance, prejudicial, best evidence rule) 84:11-85:3, (relevance, prejudicial, best evidence rule) 89:4-93:12, (relevance, prejudicial, best evidence rule) 94:6-94:13, (relevance, prejudicial, best evidence rule) 94:14-96:18, (relevance, prejudicial, best evidence rule) 96:21-97:14, (relevance, prejudicial, best evidence rule) 8:3-102:14, (relevance, prejudicial, best evidence rule) 104:7-105:16, (relevance, prejudicial, best evidence rule) 106:6-111:21(relevance, prejudicial, best evidence rule)
Sonalolita Wilson pt. II	170:8-180:1, (relevance, prejudicial, expert opinion, best evidence rule) 184:2-185:5, (relevance, prejudicial, expert opinion, best evidence rule) 185:6-186:17, (relevance, prejudicial, expert opinion, best evidence rule) 187:18-191:4, (relevance, prejudicial, expert opinion, best evidence rule) 191:15-192:8, (relevance, prejudicial, expert opinion, best evidence rule) 196:23-198:7, (relevance, prejudicial, expert opinion, best evidence rule) 205:1-207:17, (relevance, prejudicial, expert opinion, best evidence rule) 209:24-217:17, (relevance, prejudicial, expert opinion, best evidence rule) 218:22-220:11, (relevance, prejudicial, expert opinion, best evidence rule) 222:1-223:20, (relevance, prejudicial, expert opinion, best evidence rule) 225:3-227:8, (relevance, prejudicial, expert opinion, best evidence rule) 233:14-236:15, (relevance, prejudicial, expert opinion, best evidence rule) 237:14-239:14, (relevance, prejudicial, expert opinion, best evidence rule) 241:7-245:4, (relevance, prejudicial, expert opinion, best evidence rule) 248:3-249:4(relevance, prejudicial, expert opinion, best evidence rule)

## VII.

The following witnesses may be called by the parties at trial:

(a) **Plaintiff intends to call the following witnesses at trial:**

1. Plaintiff, SONALOLITA WILSON  
c/o /o Bradley S. Mainor, Esq.  
Joseph J. Wirth, Esq.  
Ash Marie Blackburn, Esq.  
Joseph W. Guindy, Esq.  
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2. Nakia McCloud  
c/o United States Attorney's Office  
501 Las Vegas Blvd. South, Suite 1100,  
(702) 388-6336
  3. Bobby Warren  
c/o United States Attorney's Office  
501 Las Vegas Blvd. South, Suite 1100  
(702) 388-6336
  4. The FRCP 30(b)(6) Witness for the United States of America  
c/o United States Attorney's Office  
501 Las Vegas Blvd. South, Suite 1100  
(702) 388-6336
  5. Defendant, Liceth Demha-Santiago  
c/o the Law Offices of Denise McCurry  
7251 West Lake Mead Blvd. #349  
Las Vegas, NV 89128  
(702) 408-3805
  6. Defendant, Juan Demha,  
c/o the Law Offices of Denise McCurry  
7251 West Lake Mead Blvd. #349, Las Vegas, NV 89128, (702) 408-3805
  7. Calvin Hayes  
Address and phone number unknown
  8. Geraldine Gray  
1232 Crafton Ave. #B  
Menton, CA 92359  
(909) 562-625
  9. Latasha Wilson  
3027 N. Orange Ave.  
Rialto, CA 92377  
(909) 543-5163
  10. Tamika Williams  
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- 1        11. Makita Cooper  
2              2093. Guthrie, Apt. C  
3              Highland, CA 92404  
4              (909) 684-1444
- 5        12. Robert Lee Hinton  
6              98 S. Martin Luther King, Apt. 234  
7              Las Vegas, NV 89106  
8              (810) 618-1344
- 9        13. Michael Tucker  
10             98 S. Martin Luther King, Apt. 234  
11             Las Vegas, NV 89106  
12             (503) 209-9954
- 13       14. Candice Hinton  
14             98 S. Martin Luther King, Apt. 234  
15             Las Vegas, NV 89106  
16             phone number unknown
- 17       15. Officer Ireland, Badge # 6044  
18             Las Vegas Metropolitan Police Department,  
19             400 S. Martin Luther King Blvd.  
20             Las Vegas, NV 89106  
21             (702) 828-3111
- 22       16. Officer Swan, Badge # 7303  
23             Las Vegas Metropolitan Police Department  
24             400 S. Martin Luther King Blvd.  
25             Las Vegas, NV 89106  
26             (702) 828-3111
- 27       17. Jaswinder Grover, M.D.  
28             FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able  
29             Nevada Spine Clinic  
30             7401 Smoke Ranch Rd. #150  
31             Las Vegas, NV 89128  
32             (702) 320-8111
- 33       18. Babuk Ghuman, M.D.  
34             FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able  
35             Nevada Spine Clinic  
36             7140 Smoke Ranch Rd. #150  
37             Las Vegas, NV 89128  
38             (702) 320-8111
- 39       19. Mark Glyman, M.D., DDS, FACS

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2 Mark Glyman, M.D., DDS, FACS  
3 1775 Village Center Cir, #150  
4 Las Vegas, NV, 89113  
5 (702) 507-5555
- 6 20. Thomas Dunn, M.D.  
7 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able  
8 Desert Orthopedic Center  
9 2800 E. Dessert Inn Rd., Ste 100  
10 Las Vegas, NV 89121  
11 (702) 731-1616
- 12 21. Don Nobis, MSPT  
13 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able  
14 Don Nobis Physical Therapy  
15 1950 E. Desert inn Rd.,  
16 Las Vegas, NV 89169  
17 (702) 735-1501
- 18 22. Louie Jan Singson, RN  
19 Care Pro Home Health  
20 5280 S. Eastern Ave, G2  
21 Las Vegas, NV 89119  
22 (702) 430-9517
23. Philip M. Paleracio, DDS  
24 Dental Center of NV, 5280 S. Eastern Ave, G2  
25 Las Vegas, NV 89119  
26 (702) 430-9517
27. David Oliveri, M.D.  
28 851 S. Rampart Dr., # 115,  
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(702) 778-9300
29. Ira Spector, M.S., C.R.C.  
30 3440 E. Russell Rd., #208  
31 Las Vegas, NV 89120,  
32 (702) 214-4294
33. Samuel Terry  
34 Exhibit A  
35 P.O. Box 530111  
36 Henderson, NV 89053
37. Robert Simmons

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- 1                   1911 E. Gary Way  
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- 3                   28. Michael Freeman  
4                   Med Dr. Ph.D., Forensic Research & Analysis  
5                   4256 NW 10th Ave. # 306  
6                   Portland, OR 97209
- 7                   29. Frank Perez, Ph.D.,  
8                   4435 N. First St., #205  
9                   Livermore, CA
- 10                  30. Kimberly E. Balough, MSBE  
11                  BiCoastal Forensics LLC  
12                  21143 Hawthorne Boulevard, Suite 415  
13                  Torrance, CA 90503  
14                  (480) 540-6213
- 15                  31. James G. Lowe, MD, FACS  
16                  Lowe-Greenwood-Zerbo Spinal Associates  
17                  1999 New Road, Suite B  
18                  Linwood, NJ, 08221  
19                  (609) 601-6363
- 20                  32. Mark Remas, MA, CRC, ABVE  
21                  The Remas Group  
22                  7710 Balboa Avenue, Suite 218-H  
23                  San Diego, CA, 92111  
24                  (858) 560-6733
- 25                  33. Warren M. Torchinsky, DDS  
26                  223 East Main Street  
27                  Maple Shade, NJ, 08052  
28                  (856) 667-7900
- 29                  34. Thomas F. Cargill, PhD, LTD,  
30                  65 Bennington Court,  
31                  Reno NV, 89511  
32                  (702) 849-1588
- 33                  a) **Plaintiff may call the following witnesses at trial if the need arises (the number of witnesses on this list that may be called heavily depends on Defendant's position as to the admissibility of Plaintiff's medical records):**
- 34                  1. Erica Johnson, the FRCP 30(b)(6) Witness(es) and/or the Person Most Knowledgeable  
35                  Records for Las Vegas Metropolitan Police Department  
36                  400 S. Martin Luther King Blvd.

Las Vegas, NV 89106  
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  6. Thomas F. Cargill, PhD, LTD,  
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Reno NV, 89511  
(702) 849-1588
  7. Rick Chavez, MD  
Pain and Addiction Integrated Network, Inc.,  
4733 Torrance Boulevard, Suite 625  
Torrance, CA, 90506  
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  8. Julie Shaked, Special Field Claims Representative  
Farmers Insurance Company  
P.O. Box 268994  
Oklahoma City, OK, 73126-8994  
(800) 435-7764
  9. Jason Regester, Fleet Services Representative General Services Administration  
Phoenix Fleet Management Center  
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- 7       11. Jared Robbins
- 8           c/o United States Attorney's Office
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- 10          (702) 388-6336
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- 12      12. Glen Banks, EMT
- 13           FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
- 14           Las Vegas Fire Rescue
- 15           500 N. Casino Center Blvd., Lane
- 16           Las Vegas, NV 89101
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- 18      13. Carlos Maltiz, Advanced EMT
- 19           FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
- 20           Las Vegas Fire Rescue
- 21           500 N. Casino Center Blvd., Lane
- 22           Las Vegas, NV 89101
- 23
- 24      14. Jefferson D. Bracey, M.D.
- 25           FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able
- 26           Rec EMP or Clark, (collectively Dr. Bracey), 901 Rancho Dr., #207, Las
- 27           Vegas, NV 89106, (702) 385-0890
- 28
- 29      15. Sandra Lee, MD
- 30           FRCP 30(B)(6) Witness and/or Person Most Knowledgeable able
- 31           for Desert Radiologist
- 32           2020 Palomino Ln., Las Vegas, NV 89106
- 33           (702) 759-8600
- 34
- 35      16. Van Nguyen, MD,
- 36           FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
- 37           Desert Radiologist
- 38           2020 Palomino Ln.
- 39           Las Vegas, NV 89106
- 40           (702) 759-8600
- 41
- 42      17. Brent Yamishita, P.T., D.P.T
- 43           FRCP 30(B)(6) Witness and/or Person Most Knowledgeable
- 44           Better Back Physical Therapy
- 45           1740 Smoke Ranch Road
- 46           Las Vegas, Nevada 89128
- 47
- 48

- 1       18. Magdalen Marron, PTA  
2       FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
3       Better Back Physical Therapy  
4       1740 Smoke Ranch Road  
5       Las Vegas, Nevada 89128
- 6       19. Nicole Hoffman, PT. MSPT,ART Practitioner  
7       FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
8       Better Back Physical Therapy  
9       1740 Smoke Ranch Road  
10      Las Vegas, Nevada 89128
- 11      20. Monique A. Mogensen, M.D.  
12      FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
13      Records for American Radiology  
14      6460 Medical Center Dr., #150,  
15      Las Vegas, NV 89148  
16      (702) 868-278
- 17      21. Michael B. Zlatkin, M.D.  
18      FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
19      Records for American Radiology  
20      6460 Medical Center Dr., #150  
21      Las Vegas, NV 89148  
22      (702) 868-2781
- 23      22. Matt Treinen, D.O.  
24      FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
25      for Pueblo Medical Imaging  
26      8551 W. Lake Mead Blvd., #150  
27      Las Vegas, NV 89128  
28      (702) 228-003
- 29      23. Raj Agrawal, M.D.  
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- 35      24. Janet Bauman, Ph.D.  
36      FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
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- 7       26. John Lyons, PT  
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12          (702) 476-0222
- 13      27. Damon Elliot, PTA  
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- 25      29. Danny Thai, RPh  
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29          Las Vegas NV 89102  
30          (702) 257-2620
- 31      30. James Peterson, M.D.  
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- 37      31. Sukhjinder Singh, M.D.  
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- 1 (702) 759-8600
- 2 32. David Plunkett, M.D.  
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6 Las Vegas, NV 89106  
7 (702) 759-8600
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9 PayLater Pharmacy  
10 552 E. Charleston Blvd.  
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- 12 34. Daniel Thai RPh  
13 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
14 LienRx  
15 26000 W. Sahara Ave. # 120  
16 Las Vegas, NV 89102
- 17 35. Lori Ortale, RPh  
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- 22 36. Michael Lundberg, D.O.  
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25 3100 N. Tenaya Way  
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- 28 37. Amit Valera, D.O.  
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33 (702) 777-7100
- 34 38. FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable  
35 Valley Hospital  
36 620 Shadow Lane  
37 Las Vegas, NV 89106  
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40 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable

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- 5 40. Badreldin A. Ibrahim, M.D.  
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- 6 41. Magalen Page, PTA  
7 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
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- 10 42. Amir Aftab, M.D  
11 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
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12 5850 S. Rainbow Blvd.  
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15 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
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19 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
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- 21 45. Michael Abiog, M.D.  
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- 9 48. Danny Thai  
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- 14 49. Daniel T. Shiode Ph.D., ABPP  
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18 Las Vegas, NV 89106  
19 (702) 384-4110
- 20 50. Russell Shah, M.D.  
21 FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable  
22 Radar Medical Group  
23 2628 W. Charleston Blvd.  
24 Las Vegas, NV 89102  
25 (702) 644-0600
- 26 51. Michael I. Rothman, M.D.  
27 FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
28 Records for Opensided MRI  
600 Rancho Dr. # 101,  
Las Vegas, NV 89106  
(702) 932-2740
52. Keith Lewis, M.D.  
FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable  
Opensided MRI  
600 Rancho Dr. # 101  
Las Vegas, NV 89106  
(702) 932-2740
53. Decorah Perkins, NP.  
FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable  
Grand Desert Psychiatric Services

2021 S. Jones Blvd.  
Las Vegas, NV 89146  
(702) 202-0099

54. Anita Rich, M.D.  
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
Precision Diagnostic Imaging  
7140 Smoke Ranch Rd Ste. B  
Las Vegas, NV 89128  
(702) 868-2781

55. Simon Farrow, M.D.  
FRCP 30(b0(6) witness and/or Person Most Knowledgeable  
Monitoring Associates  
9811 W. Charleston Blvd.  
Las Vegas, NV 89117  
(833) 664-6342

56. Craig Carroll, D.O.  
NRCP 30(b0(6) witness and/or Person Most Knowledgeable  
Monitoring Associates  
9811 W. Charleston Blvd.,  
Las Vegas, NV 89117  
(833) 664-6342

57. Zahld Hamid, M.D  
FRCP 30(b0(6) witness and/or Person Most Knowledgeable  
Dr. Hamid  
9811 W. Charleston Blvd.  
Las Vegas, NV 89117,  
(833) 664-6342

58. Mike Phillips  
FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
Next Step Medical  
8285 W. Arby Ave. Ste. 155  
Las Vegas, NV 89113

59. Demetrice Davis, M.D.  
FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable  
Red Rock Radiology Associates  
7130 Smoke Ranch Rd STE 101  
Las Vegas, Nevada 89128

60. Ronald F Sauer, Jr., DO  
FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable  
Red Rock Radiology Associates

**MAINOR WIRTH, LLP**  
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148  
Phone: (702) 464-5000 | Fax: (702) 463-4440

1                   7130 Smoke Ranch Rd STE 101  
 2                   Las Vegas, Nevada 89128

- 3                 61. Edward Sisson, CPO  
 4                   FRCP 30(B)(6) Witness and/or the Person Most Knowledgeable  
 5                   Prove Partners, LLC, Prosthetic Center of Excellence  
 6                   2047 West Charleston Blvd Suite 100  
 7                   Las Vegas, NV 89102
- 8                 62. Dawn Neilson, CFom  
 9                   FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
 10                  Prove Partners, LLC, Prosthetic Center of Excellence  
 11                  2047 West Charleston Blvd Suite 100  
 12                  Las Vegas, NV 89102
- 13                 63. FRCP 30(b)(6) witness, and/or Person Most Knowledgeable  
 14                  Dental/Southern Nevada General Dentistry Prada, PPLC,  
 15                  2250 S. Rancho Dr., #205,  
 16                  Las Vegas, NV 89102  
 17                  (702) 291-2031
- 18                 64. Mark Lawrence, RTP  
 19                  FRCP 30(B)(6) Witness and/or Person Most Knowledgeable  
 20                  Don Nobis Physical Therapy  
 21                  1950 E. Desert inn Rd.,  
 22                  Las Vegas, NV 89169  
 23                  (702) 735-1501
- 24                 65. Plaintiff reserves the right to call any witnesses identified in Defendants' witness  
 25                  list and named during the course of discovery;
- 26                 66. Plaintiff reserves the right to call rebuttal and/or impeachment witnesses at trial;
- 27                 67. Plaintiff reserves the right to call any of Defendants' experts as witnesses.

28                 Defendant, USA, objects to the vast number of witnesses and potential witnesses provided  
 29                 by Plaintiff above. In addition, Defendant, USA objects to the designation of a Fed. R. Civ. P.  
 30                 30(b)(6) witness as that rule applies to deposition testimony and not testimony related to trial.  
 31                 Furthermore, Plaintiff fails to list specific topics to be covered by any 30(b)(6) witness. Defendant  
 32                 USA reserves all rights of objections to testimonies at trial including but not limited to any expert  
 33                 opinions that were not timely disclosed in discovery, lack foundation, and/or are not relevant and  
 34                 reliable. *See, e.g.,* Fed. R. Civ. P. 26(a)(2), 37(c)(1), *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S.

1 579 (1993) and its progeny. Defendant, USA, also objects to testimony by any witness that was not  
2 disclosed during the discovery period or whose testimony was already excluded by the Court,  
3 including Dr. Oliveri.

4 (a) **Defendant USA's Witnesses**

- 5 1. Nakia McCloud  
c/o United States Attorney's Office  
501 Las Vegas Blvd. South, Suite 1100,  
(702) 388-6336
- 6 2. Plaintiff, SONALOLITA WILSON  
c/o /o Bradley S. Mainor, Esq.  
Joseph J. Wirth, Esq.  
Ash Marie Blackburn, Esq.  
Joseph W. Guindy, Esq.  
MAINOR WIRTH, LLP  
6018 S. Fort Apache Road, Ste. 150  
Las Vegas, NV 89148  
(702) 464-5000
- 7 3. Defendant, Liceth Demha-Santiago  
c/o the Law Offices of Denise McCurry  
7251 West Lake Mead Blvd. #349  
Las Vegas, NV 89128  
(702) 408-3805
- 8 4. Defendant, Juan Demha,  
c/o the Law Offices of Denise McCurry  
7251 West Lake Mead Blvd. #349,  
Las Vegas, NV 89128,  
(702) 408-3805
- 9 5. Kimberly E. Balough, MSBE  
BiCoastal Forensics LLC  
21143 Hawthorne Boulevard, Suite 415  
Torrance, CA 90503  
(480) 540-6213
- 10 6. Rick Chavez, MD  
Pain and Addiction Integrated Network, Inc.,  
4733 Torrance Boulevard, Suite 625  
Torrance, CA, 90506  
(323) 833-8269

1           7. James G. Lowe, MD, FACS  
2           Lowe-Greenwood-Zerbo Spinal Associates  
3           1999 New Road, Suite B  
4           Linwood, NJ, 08221  
5           (609) 601-6363

6           8. Mark Remas, MA, CRC, ABVE  
7           The Remas Group  
8           7710 Balboa Avenue, Suite 218-H  
9           San Diego, CA, 92111  
10          (858) 560-6733

11          9. Warren M. Torchinsky, DDS  
12          223 East Main Street  
13          Maple Shade, NJ, 08052  
14          (856) 667-7900

15          10. Thomas F. Cargill, PhD, LTD,  
16           65 Bennington Court,  
17           Reno NV, 89511  
18           (702) 849-1588

19          Defendant, USA, reserves the right to call any witnesses identified in Plaintiff's witness  
20          list and named during the course of discovery;

- 21          11. Defendant reserves the right to call rebuttal and/or impeachment witnesses at trial;  
22          12. Defendant reserves the right to call any of Plaintiff's experts as witnesses.

23          **(b) Defendants' DEMHA-SANTIAGO, and DEMHA's Witnesses**

24          1. Plaintiff, SONALOLITA WILSON  
25           c/o /o Bradley S. Mainor, Esq.  
26           Joseph J. Wirth, Esq.  
27           Ash Marie Blackburn, Esq.  
28           Joseph W. Guindy, Esq.  
29           MAINOR WIRTH, LLP  
30           6018 S. Fort Apache Road, Ste. 150  
31           Las Vegas, NV 89148  
32           (702) 464-5000

33          2. Nakia McCloud  
34           c/o United States Attorney's Office  
35           501 Las Vegas Blvd. South, Suite 1100,  
36           (702) 388-6336

37          3. Defendant Liceth Demha-Santiago  
38           c/o Hall Jaffe and Clayton, LLP

1                   7425 Peak Drive  
2                   Las Vegas, NV 89128

3                  4. Defendant Juan Demha  
4                   c/o Hall Jaffe and Clayton, LLP  
5                   7425 Peak Drive  
6                   Las Vegas, NV 89128

7                  5. Officer Swan, Badge No. 7303  
8                   Las Vegas Metropolitan Police Department  
9                   400 South Martin Luther King Boulevard  
10                  Las Vegas, NV 89103

11                 6. Hugh S. Selznick, MD  
12                   Consultants Medical Group  
13                   2500 West Sahar Ave., Suite 207  
14                   Las Vegas, NV 89102

15                 7. Defendants reserve the right to call any and all witnesses identified in Plaintiff's  
16                   witness list and named during the course of discovery;

17                 8. Defendants reserve the right to call any and all witnesses identified in Defendant  
18                   USA's witness list and named during the course of discovery;

19                 9. Defendants reserve the right to call rebuttal and/or impeachment witnesses at  
20                   trial;

21                 10. Defendants reserve the right to call any of Plaintiff's experts as witnesses.

22                 11. Defendants reserve the right to call any of Defendant USA's experts as  
23                   witnesses.

### VIII.

24                 The attorneys or parties have met and jointly offer these trial dates:

25                 November 28, 2022 through December 2, 2022

26                 January 17, 2023 through 2023

27                 January 23, 2023 through January 27, 2023

28                 February 13, 2023 through February 17, 2023

It is expressly understood by the undersigned that the court will set the trial of this matter

1 on one of the agreed-upon dates if possible; if not, the trial will be set at the convenience of the  
2 court's calendar.

3 **IX.**

4 Plaintiff estimates that the trial will take a total of 17-21 days. Defendant USA will not  
5 stipulate to the authenticity of Plaintiff's medical records. As such, Plaintiff will be required to call  
6 a witness from each of her facilities to authenticate records from all forty-four (44) medical  
7 providers. Defendants Demha-Santiago and Demha had no objection to stipulating to the  
8 authenticity of Plaintiff's medical records.

9 Defendant USA believes the number of witnesses Plaintiff intends to call is excessive and  
10 less time is needed. Defendant USA believes it can present its case-in-chief in 2-3 days.

11 APPROVED AS TO FORM AND CONTENT:

12 DATED this 11th day of May, 2022.

13 **MAINOR WIRTH, LLP**

14 /s/Ash Marie Blackburn

15 BRADLEY S. MAINOR, ESQ.  
Nevada Bar No. 7434  
ASH MARIE BLACKBURN, ESQ.  
Nevada Bar No. 14712  
6018 S. Fort Apache Road, Ste. 150  
Las Vegas, NV 89148-5652  
*Counsel for Plaintiff*

16 DATED this 11th day of May, 2022.

17 **HALL JAFFE & CLAYTON, LLP**

18 /s/ Jan Tomaszik

19 STEVEN T. JAFFE, ESQ.  
Nevada Bar No. 7035  
JAN K. TOMASIK, ESQ.  
Nevada Bar No. 15104  
7425 Peak Drive  
Las Vegas, NV 89128  
*Attorneys for Defendant/Cross-  
Claimant/Cross-Defendant Juan Demha  
And Cross-Claimant/Cross-Defendant Liceth  
Dehma-Santiago*

20  
21 DATED this 11th day of May, 2022.

22 **UNITED STATES DISTRICT  
ATTORNEY**

23 /s/ Skyler Pearson

24 SKYLER PEARSON, ESQ.  
PATRICK ROSE, ESQ.  
501 Las Vegas Blvd, South., Ste. 1100  
Las Vegas, NV 89101  
*Attorney for Defendant United States of  
America*

1 X.  
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ACTION BY THE COURT

This case is set for jury trial on **January 23, 2023, at 9:00 a.m.** Calendar call will be held on **January 18, 2023, at 1:30 p.m.** This pretrial order has been approved by the parties to this action as evidenced by their signatures or the signatures of their attorneys hereon, and the order is hereby entered and will govern the trial of this case. This order may not be amended except by court order and based upon the parties' agreement or to prevent manifest injustice.

DATED: May 20, 2022.

  
11 Steven C. Mahan  
12 UNITED STATES DISTRICT JUDGE

MAINOR WIRTH, LLP  
6018 S. Ft. Apache Rd., Ste. 150, Las Vegas, NV 89148  
Phone: (702) 464-5000 | Fax: (702) 463-4440

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1 EXHIBIT A  
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4  
5 UNITED STATES DISTRICT COURT  
6 DISTRICT OF NEVADA  
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8

9 SONALOLITA WILSON  
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11 Plaintiff  
12 vs.  
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14 UNITED STATES OF AMERICA ;  
15 LICETH DEMHA-SANTIAGO; JUAN  
16 DEMHA; DOES I THROUGH X; AND  
17 ROE CORPORATIONS 1 THROUGH X,  
18

19 Defendants.  
20

21 CASE NO.: 2:18-CV-01241-JCM-NJK  
22

23 Stipulated Exhibits  
24

Exhibit	Description
1.	Manpower Employment File
2.	Plaintiff's Employment Records From Staffmark
3.	TrueBlue Records/ Peoplesready Regarding Plaintiff's Earnings

1 EXHIBIT A-1  
23 UNITED STATES DISTRICT COURT  
4 DISTRICT OF NEVADA  
56 SONALOLITA WILSON  
78 Plaintiff  
9vs.  
1011 UNITED STATES OF AMERICA ;  
12 LICETH DEMHA-SANTIAGO; JUAN  
13 DEMHA; DOES I THROUGH X; AND  
14 ROE CORPORATIONS 1 THROUGH X,  
1516 Defendants.  
1718 CASE NO.: 2:18-CV-01241-JCM-NJK  
1920 Stipulated Exhibits Available For Use At  
21 The Time of Trial But Are Not Currently  
22 Admitted  
23

Exhibit	Description
1.	Plaintiff's First Amended Complaint
2.	Defendant United States' Answer to Plaintiff's First Amended Complaint
3.	Defendants' Liceth Demha-Santiago and Juan Demha's Answer to Plaintiff's First Amended Complaint
4.	Life Expectance Table
5.	Transcripts of Deposition of Babuk Guman, M.D., With Exhibits
6.	Transcript of Deposition of Rick Chavez, M.D., With Exhibits
7.	Transcript of deposition of Liceth Demha
8.	Transcript of deposition of Mark L. Glyman, M.D., D.D.S., F.A.C.S., with exhibits
9.	Transcript of deposition of Robert L. Hinton
10.	Transcript of deposition of Duff Kaster, D.D.S., with exhibits
11.	Transcript of deposition of Nakia McCloud, with exhibits
12.	Transcript of deposition of Sonalolita G. Wilson, with exhibits. Vol 1
13.	Transcript of deposition of Sonalolita G. Wilson, with exhibits Vol 2

1	14.	Transcript of deposition of Kimberly E. Balogh
2	15.	Transcript of deposition of David J. Oliveri M.D
3	16.	Transcript of deposition of Robert Simmons
4	17.	Transcript of deposition of Thomas Dunn, M.D
5	18.	Transcript of deposition of Jaswinder Grover, M.D
6	19.	Transcript of deposition of Frank A. Perez, Ph.D
7	20.	David Oliveri, M.D. Curriculum Vitae, Testimony List, and Fess Schedule
8	21.	David Oliveri, M.D. Expert Report dated December 2, 2019
9	22.	David Oliveri, M.D. Supplemental Expert Report dated August 4, 2020
10	23.	Ira Spector M.S. C.R.C, M.D. Curriculum Vitae, Testimony List, and Fess Schedule
11	24.	Ira Spector M.S. C.R.C, Expert Report dated December 12, 2019
12	25.	Ira Spector M.S. C.R.C, Rebuttal Expert Report dated July 23, 2020
13	26.	Samuel R. Terry Curriculum Vitae, Testimony List, and Fess Schedule
14	27.	Samuel R. Terry Expert Report dated June 3, 2020
15	28.	Michael D. Freeman, MedDr, PhD, MPH, DLM, FAAFS Curriculum Vitae
16	29.	Michael D. Freeman, MedDr, PhD, MPH, DLM, FAAFS Expert Report dated July 8, 2020
17	30.	Michael D. Freeman, MedDr, PhD, MPH, DLM, FAAFS Rebuttal Expert Report dated August 5, 2020
18	31.	Frank Perez, Ph.D Curriculum Vitae, Testimony List, and Fess Schedule
19	32.	Frank Perez, PhD, FAAFS Expert Report dated July 8, 2020
20	33.	Frank Perez, PhD, FAAFS Expert Report dated July 8, 2020
21	34.	Robert Simmons Curriculum Vitae, Testimony List, and Fess Schedule
22	35.	Robert Simmons Rebuttal Expert Report dated August 7, 2020
23	36.	Terrence M. Clauretie, Ph.D. Curriculum Vitae, Testimony List, and Fess Schedule

1	37.	Terrence M. Clauretie, Ph.D. Expert Report dated February 4, 2020
2	38.	Thomas Dunn, MD Curriculum Vitae, Testimony List, and Fess Schedule
3	39.	Thomas Dunn, MD Rebuttal Expert Report dated August 3, 2020
4	40.	Travis Snyder, D.O. Curriculum Vitae, Testimony List, and Fess Schedule
5	41.	Travis Snyder, D.O. Rebuttal Expert Report dated August 7, 2020
6	42.	Travis Snyder, D.O. Presentation
7	43.	Kimberly Balogh's Expert Report (dated July 7, 2020)
8	44.	Kimberly Balogh's Rebuttal Expert Report (dated August 7, 2020)
9	45.	Kimberly Balogh's Curriculum Vitae, Testimony List, and Fess Schedule
10	46.	Deposition of Kimberly Balogh (November 4, 2020)
11	47.	Dr. James Lowe's Expert Report (dated April 27, 2020)
12	48.	Dr. James Lowe's Rebuttal Expert Report (dated July 27, 2020)
13	49.	Dr. James Lowe's Curriculum Vitae, Testimony List, and Fess Schedule
14	50.	Dr. Rick Chavez's Expert Report (dated July 7, 2020)
15	51.	Dr. Rick Chavez's Curriculum Vitae, Testimony List, and Fess Schedule
16	52.	Deposition of Chavez (August 27, 2020)
17	53.	Dr. Warren Torchinsky's Expert Report (dated November 12, 2019)
18	54.	Dr. Warren Torchinsky's Curriculum Vitae, Testimony List, and Fess Schedule
19	55.	Mark Remas's Expert Report (dated April 28, 2020)
20	56.	Mark Remas's Curriculum Vitae, Testimony List, and Fess Schedule
21	57.	Dr. Thomas Cargill's Rebuttal Expert Report (dated August 3, 2020)
22	58.	Dr. Thomas Cargill's Curriculum Vitae, Testimony List, and Fess Schedule
23	59.	Curriculum Vitae, Fee schedule, Prior Testimony List and Reports authored by Mark Glyman, M.D., DDS, FACS
24	60.	Google Overhead Photo Depicting the Subject Intersection (1)
	61.	Google Overhead Photo Depicting the Subject Intersection (2)

1	62.	Color Photo Depicting the Scene of the Subject Incident (1)
2	63.	Color Photo Depicting the Scene of the Subject Incident (2)
3	64.	Color Photo Depicting the Scene of the Subject Incident (3)
4	65.	Color Photo Depicting the Scene of the Subject Incident (4)
5	66.	Color Photo Depicting the Scene of the Subject Incident (5)
6	67.	Color Photo Depicting the Scene of the Subject Incident (6)
7	68.	Black and White Photo Depicting Plaintiff's Property Damage (1)
8	69.	Black and White Photo Depicting Plaintiff's Property Damage (2)

**EXHIBIT B****UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SONALOLITA WILSON

Plaintiff  
vs.UNITED STATES OF AMERICA ;  
LICETH DEMHA-SANTIAGO; JUAN  
DEMHA; DOES I THROUGH X; AND  
ROE CORPORATIONS 1 THROUGH X,

Defendants.

CASE NO.: 2:18-CV-01241-JCM-NJK

**Plaintiff's Exhibits**

<b>Exhibit</b>	<b>Description</b>	<b>Defendants Demha-Santiago and Demha's Objections</b>	<b>Defendant USA's Objections</b>
1.	Traffic Accident Report #LVM160901003306	Prejudicial, Relevance, Foundation, Best Evidence Rule	Relevance; prejudicial; foundation; best evidence
2.	Traffic Accident Report #LVM160901002946	Prejudicial, Relevance, Foundation, Best Evidence Rule	Relevance; prejudicial; foundation; best evidence
3.	Custodian of Records for 911 recordings and breakdown	Relevance, Prejudicial	Hearsay; prejudicial; authenticity
4.	911 Recordings	Relevance, Prejudicial	Hearsay; prejudicial; authenticity
5.	Transcribed Statement of Def. Demha-Santiago	Privileged, Relevance, Prejudicial, Foundation, Best Evidence Rule	Prejudicial; foundation; best evidence
6.	IRS Incident Report	Relevance, Prejudicial, Foundation, Best Evidence Rule	Privileged; prejudicial; foundation; best evidence
7.	Color Photo Depicting Plaintiff's Property Damage		(No Bates Number Provided) Relevance; foundation; authenticity

1	8.	Farmers Insurance Exchange Property Damage Estimate of Plaintiff's Vehicle	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best evidence; authenticity
2	9.	Black Box Data for Defendant's Vehicle - GMC Terrain 2014	Relevance, Prejudicial	Prejudicial; foundation; best evidence; authenticity
3	10.	Vehicle information regarding vehicle driven by Nikia McCloud's	Relevance, Prejudicial	Prejudicial; foundation; best evidence; authenticity
4	11.	Plaintiff's Employee Wage Sheet with Manpower	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	
5	12.	Plaintiff's Employment Records From Staffmark	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	
6	13.	TrueBlue Records/ Peopleready Regarding Plaintiff's Earnings	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	
7	14.	Life Expectance Table	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best evidence; authenticity
8	15.	Color Photo of Plaintiff's Injury Taken by Plaintiff on September 13, 2016 (1)	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	(No Bates Numbers Provided) Relevance; prejudicial; foundation; best evidence; authenticity
9	16.	Color Photo of Plaintiff's Injury Taken by Plaintiff on September 13, 2016 (2)	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	(No Bates Numbers Provided) Relevance; prejudicial; foundation; best evidence; authenticity
10	17.	Video of Plaintiff Depicting Full Body Seizure Taken by Robert Hinton	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
11	18.	Video of Plaintiff Depicting Right Leg Spasm Taken by Robert Hinton	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
12	19.	Video of Plaintiff Depicting Leg Spasms	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best

	When Walking Taken by Robert Hinton		evidence; authenticity; hearsay
20.	Video of Plaintiff Depicting Full Body Seizure	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
21.	Video of Plaintiff Depicting Right Leg Spasm	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
22.	Video of Plaintiff Depicting Right Leg Spasm	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best evidence; authenticity; hearsay
23.	Plaintiff Medical Specials Chart	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; foundation; best evidence; authenticity
24.	Medical Records and Billing with Custodian of Records for City of Las Vegas Fire and Rescue for Date of Service September 1, 2016	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
25.	Medical Records and Billing with Custodian of Records for City of University Medical Center for Date of Service September 1, 2016	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
26.	Medical Records and Billing for McCourt PLLC a/k/a EMP of Clark UMC for Date of Service September 1, 2016	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
27.	Medical Records and Billing with Custodian of Records for Desert Radiology Solutions Dates of Service	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity

1	September 1, 206 Through December 6, 2017		
2	28. Medical Records and Billing with Custodian of Records for Nevada Spine Clinic Dates of Service September 8, 2016 Through April 15, 2022	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
3	29. Medical Records and Billing with Custodian of Records for Better Back Physical Therapy Dates of Service September 9, 2016 for Through December 2, 2016	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
4	30. Medical Records and Billing with Custodian of Records for Mark Glyman, M.D. Dates of Service September 13, 2016 Through April 7., 2017	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
5	31. Medical Records and Billing with Custodian of Records for American Radiology Date of Service January 11, 2017	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
6	32. Medical Records and Billing with Custodian of Records for Desert Orthopaedics Center Dates of Service September 30, 2016 Through March 15, 2018	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
7	33. Medical Records and Billing with Custodian of Records for Pueblo Medical Imaging Dates	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
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	of Service September 30, 2016		
34.	Medical Records and Billing for Absolute Dental Date of Service October 13, 2016	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
35.	Medical Records and Billing with Custodian of Records for Desert Anesthesiologist, Inc. Date of Service January 11, 2017	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
36.	Medical Records and Billing with Custodian of Records for Specialty Surgery Center Date of Service January 11, 2017	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
37.	Medical Records and Billing with Custodian of Records for Abby Dental Center, Inc. Dates of Service February 27, 2017 Through March 15, 2017	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
38.	Medical Records and Billing with Custodian of Records for Smoke Ranch Surgery Center Dates of Service December 6, 2017 Through December 13, 2021	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
39.	Medical Records and Billing with Custodian of Records for Don Nobis Progressive Physical Therapy Dates of Service December 26, 2017 Through February 8, 2022	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity

1	40.	Medical Records and Billing with Custodian of Records for Silver State Neurology Dates of Service January 2, 2018 Through February 26, 2018	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
2	41.	Medical Records and Billing with Custodian of Records for Louis F. Mortillaro Dates of Service November 14, 2018 Through December 5, 2018	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
3	42.	Medical Records and Billing for Lien RX Dates of Service January 4, 2017 Through January 23, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
4	43.	Medical Records and Billing with Custodian of Records for Specialty Pharmacy Dates of Service January 4, 2019 Through February 25, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
5	44.	Medical Records and Billing with Custodian of Records for Smoke Ranch Specialists Dates of Service January 10, 2019 Through May 2, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
6	45.	Medical Records and Billing for CarePro Home Health, Dates of Service January 11, 2019 Through February 11, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
7	46.	Medical Records and Billing with Custodian of Records for Lyons Home Care Dates of Service January 12,	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
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	2019 Through February 1, 2019		
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5	47. Medical Records and Billing with Custodian of Records for PayLater Pharmacy Date of Service January 23, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
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10	48. Medical Records and Billing with Custodian of Records for Comprehensive Medical Dates of Service January 29, 2019 Through April 26, 2022	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
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19	49. Medical Records and Billing with Custodian of Records for American Medical Response Date of Service May 2, 2019 Through May 20, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
20	21	22	23
24	50. Medical Records and Billing with Custodian of Records for Las Vegas Pharmacy Dates of Service March 8, 2019 Through July 1, 2020	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
51.	Medical Records and Billing with Custodian of Records for Mountain View Hospital Dates of Service May 2, 2019 Through May 3, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
52.	Medical Records and Billing with Custodian of Records for Fremont Emergency Services Date of Service May 2, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
53.	Medical Records and Billing with Custodian of Records for	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best

	Mountains Edge Hospital Dates of Service May 3, 2019 Through May 6, 2019		evidence; authenticity
54.	Medical Records and Billing with Custodian of Records for Valley Hospital Medical Center Dates of Service May 10, 2019 Through May 12, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
55.	Medical Records and Billing with Custodian of Records for Shadow Emergency Physicians Date of Service May 8, 2019 through May 14, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
56.	Medical Records and Billing with Custodian of Records for Monitoring Associates Date of Service May 15, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
57.	Medical Records and Billing with Custodian of Records for Summerlin Hospital Medical Center Dates of Service May 15, 2019 Through May 20, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
58.	Medical Records and Billing with Custodian of Records for Kindred Hospital Las Vegas-Sahara Campus Dates of Service May 21, 2019 Through July 4, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
59.	Medical Records and Billing with Custodian of Records for Next Step Medical Date of Service July 3, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity

1	60.	Medical Records and Billing with Custodian of Records for Dental Center of Nevada Date of Service September 16, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
2	61.	Medical Records and Billing with Custodian of Records for Zynex Medical, Inc. Date of Service November 21, 2019	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
3	62.	Medical Records and Billing with Custodian of Records for Shiode Psychotherapy, Inc. Dates of Service December 12, 2019 Through March 9, 2020	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
4	63.	Medical Records and Billing with Custodian of Records for Radar Medical Group Dates of Service January 16, 2020 Through August 7, 2020	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
5	64.	Medical Records and Billing with Custodian of Records for Open Sided MRI Dates of Service February 2, 2020 Through February 7, 2020	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
6	65.	Medical Records and Billing with Custodian of Records for Grand Desert Psychiatric Services Dates of Service March 16, 2020 Through May 14, 2020	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
7	66.	Medical Records and Billing with Custodian of Records for Las Vegas Health Services	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best

1	Dates of Service July 8, 2020 Through August 4, 2020		evidence; authenticity
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3	67. Medical Records and Billing for Silver State Adult Day care Dates of Service October 1, 2020 Through November 4, 2021	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
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5	68. Medical Records and Billing with Custodian of Records for Prove Partners Dates of Service May 12, 2021 Through February 8, 2022	Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
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7	69. Defendant United State's Responses and Objections to Plaintiff's First Set of Interrogatories	Defendant objects to the improper use of USA's written discovery responses as trial exhibits. The responses mistake evidence. Relevance, Prejudicial, Hearsay, Best Evidence Rule, Foundation	Relevance; prejudicial; Hearsay; best evidence; foundation
8			
9	70. Defendant United State's Responses and Objections to Plaintiff's First Set of Requests for Production	Defendant objects to the improper use of USA's written discovery responses as trial exhibits. The responses mistake evidence. Relevance, Prejudicial, Hearsay, Best Evidence Rule, Foundation	Relevance; prejudicial; Hearsay; best evidence; foundation
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11	71. Defendant Liceth Demha Santiago's Responses to Plaintiff's Interrogatories		Relevance; prejudicial; Hearsay; best evidence; foundation
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13	72. Defendant Liceth Demha Santiago's Responses to Plaintiff's Request for Production of Documents		Relevance; prejudicial; Hearsay; best evidence; foundation
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1 EXHIBIT C  
2  
3UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

4 SONALOLITA WILSON

5 Plaintiff

vs.

6 UNITED STATES OF AMERICA ; LICETH  
7 DEMHA-SANTIAGO; JUAN DEMHA;  
8 DOES I THROUGH X; AND ROE  
CORPORATIONS 1 THROUGH X,9 Defendants.  
10

CASE NO.: 2:18-CV-01241-JCM-NJK

Defendant United States of America's  
Exhibits

11 Defendant United States of America hereby provide its list of trial exhibits:

<u>Ex No.</u>	<u>Exhibit Description</u>	Defendants Demha-Santiago and Demha's Objections	Plaintiff's Objections
504	2018 W-4 Completed Form for Sonalolita Wilson		Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity
506	Plaintiff's Response to Defendant United States' First Set of Interrogatories (dated May 31, 2019)		Relevance; prejudicial; Hearsay; best evidence; foundation
507	Plaintiff's First Supplemental Response to Defendant United States' First Set of Interrogatories (dated November 8, 2019)		Relevance; prejudicial; Hearsay; best evidence; foundation
508	Plaintiff's Second Supplemental Response to Defendant United States' First Set of Interrogatories (dated January 28, 2021)		Relevance; prejudicial; Hearsay; best evidence; foundation
509	Plaintiff's Third Supplemental Response to Defendant USA's First Set of		Relevance; prejudicial; Hearsay;

<u>Ex No.</u>	<u>Exhibit Description</u>	Defendants Demha-Santiago and Demha's Objections	Plaintiff's Objections
	Interrogatories (dated February 5, 2021)		best evidence; foundation
510	Plaintiff's Response to Defendant United States' Second Set of Interrogatories (dated November 22, 2019)		Relevance; prejudicial; Hearsay; best evidence; foundation
511	Plaintiff's Response to Defendant United States' Third Set of Interrogatories (dated March 20, 2020)		Relevance; prejudicial; Hearsay; best evidence; foundation
512	Plaintiff's Response to Defendant Demha's First Set of Interrogatories		Relevance; prejudicial; Hearsay; best evidence; foundation
513	Plaintiff's First Supplemental Response to Defendant Demha's First Set of Interrogatories		Relevance; prejudicial; Hearsay; best evidence; foundation
514	Plaintiff's Second Supplemental Response to Defendant Demha's First Set of Interrogatories (February 5, 2021)		Relevance; prejudicial; Hearsay; best evidence; foundation
515	Demha Defendants' Answers to Plaintiffs' Interrogatories (dated February 28, 2020)		

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EXHIBIT D2  
UNITED STATES DISTRICT COURT  
3  
DISTRICT OF NEVADA4  
SONALOLITA WILSON,5  
Plaintiff,6  
vs.7  
UNITED STATES OF AMERICA; LICETH  
DEMHA-SANTIAGO; JUAN DEMHA; DOES  
I through X; and ROE CORPORATIONS I  
through X, inclusive8  
Defendants.9  
CASE NO.: 2:18-cv-01241-JCM-NKJ10  
**Defendant Liceth Demha-Santiago and  
Juan Demha's Exhibits**

Exhibit	Description	Defendant USA's Objections	Plaintiff's Objections
1.	Damage Estimate of 2005 Toyota Corolla	Relevance; prejudicial; foundation; best evidence; authenticity	
2.	Farmers Insurance Exchange Estimate of Record for 2005 Toyota Corolla	Relevance; prejudicial; foundation; best evidence; authenticity	
3.	CCC One Market Valuation Report	Relevance; prejudicial; foundation; best evidence; authenticity	
4.	Medical Records and Billing from Mark L. Glyman M.D.	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
5.	Medical Records, Billing and Films from American Radiology	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
6.	Medical Records and Billing from Nevada Spine Clinic	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
7.	Medical Records and Billing from Smoke Ranch Surgery Center	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
8.	Medical Records and Billing from Don Nobis Progressive Physical Therapy	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
9.	Billing from Abbey Dental Center, Inc.	Relevance; prejudicial; hearsay; foundation; best	

		evidence; authenticity	
10.	Medical Records and Billing from Absolute Dental	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
11.	Billing from Las Vegas Pharmacy	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
12.	Medical records, films and billing from Kindred Rehabilitation Hospital	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
13.	Billing from Smoke Ranch Specialists	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
14.	Medical records and billing from Daniel Shiode, Ph.D.	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
15.	Grand Desert Psychiatric Services		
16.	Medical records and billing from Monitoring Associates/Neuromonitoring Associates	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
17.	Medical records and billing from Zynex	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
18.	Medical records and films from Precision Diagnostic Imaging	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
19.	Records and billing from Silver State Adult Day Care	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
20.	Medical Records and Billing from Las Vegas Health Services, Inc.	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
21.	Medical Records and Billing from Silver State Neurology	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
22.	Next Step Medical	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
23.	Medical Billing from Prove Partners	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
24.	Medical billing and records Absolute Dental/Southern Nevada General Dentistry	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	

	Prada, PPLC		
1	25.	Medical billing and records for Care Pro Home Health	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
2	26.	Medical billing and records for Dental Center of NV	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
3	27.	Las Vegas Fire and Rescue Receipts	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
4	28.	University Medical Center of Southern Nevada Receipt	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
5	29.	EMP of Clark UMC McCourt PLLC Medical Group Receipt	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
6	30.	University Medical Center of Southern Nevada, Department of Radiology Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
7	31.	Better Back Physical Therapy under Nevada Spine Clinic	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
8	32.	Mark L. Glyman, M.D., D.D.S.	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
9	33.	Desert Orthopaedic Center Health Insurance Claim Form	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
10	34.	Pueblo Medical Imaging Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
11	35.	Specialty Surgery Center Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
12	36.	Better Back Physical Therapy Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
13	37.	Desert Orthopaedic Center Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
14	38.	Dr. Mark Glyman Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
15	39.	Las Vegas Fire and Rescue Responsive Records	Relevance; prejudicial; hearsay; foundation; best

		evidence; authenticity	
1	40.	Pueblo Medical Imaging Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
2	41.	Specialty Surgery Center Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
3	42.	University Medical Center Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
4	43.	Desert Orthopaedic Center Responsive Radiology Images	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
5	44.	Specialty Surgery Center Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
6	45.	Lien RX Billing Responsive Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
7	46.	Orthopedic Specialty Hospital of Nevada Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
8	47.	Orthopedic Specialty Hospital of Nevada Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
9	48.	Mountain View Hospital Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
10	49.	Lyons Home Care Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
11	50.	Better Back Physical Therapy Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
12	51.	Specialty Surgery Center Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
13	52.	Kindred Transitional Care and Rehabilitation-Spring Valley Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
14	53.	Valley Hospital Medical Center Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity
15	54.	University Medical Center Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best

	and Billing Records	evidence; authenticity	
55.	University Medical Center Responsive Radiology Declaration and Records (disc)	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
56.	Dr. Louis F. Mortillaro Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
57.	Abbey Dental Responsive Records and X-Rays	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
58.	Valley Hospital Responsive Radiology Discs (2)	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
59.	Summerlin Hospital Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
60.	Red Rock Diagnostics Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
61.	986 Pharmacy Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
62.	Mountain View Hospital Responsive Radiology Records and Disc (1)	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
63.	Paylater Pharmacy Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
64.	Desert Orthopaedic Center Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
65.	Desert Radiology Responsive Medical Records and Radiology Discs	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
66.	Pueblo Medical Imaging Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
67.	Pueblo Medical Imaging Response Radiology Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
68.	Mountain View Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
69.	Summerlin Hospital Responsive Radiology	Relevance; prejudicial; hearsay; foundation; best	

	Records	evidence; authenticity	
1	70. Pueblo Medical Imaging Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
2	71. Better Back Physical Therapy Responsive Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
3	72. OpenSided MRI Responsive Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
4	73. Dr. David Oliveri Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
5	74. Radar Medical Group Responsive Medical and Billing Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
6	75. OpenSided MRI Responsive Medical and Radiology Records (disc)	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
7	76. Red Rock Diagnostics Responsive Billing Records for OpenSided MRI	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
8	77. Desert Anesthesiologist Responsive Billing and Medical Records	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
9	78. Allegiant Spine Institute	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
10	79. Certified Vocational Services		Relevance, Prejudicial, Foundation, Best Evidence Rule, Authenticity
11	80. Las Vegas Fire and Rescue	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
12	81. Specialty Pharmacy	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
13	82. Sonia Wilson's Summary Slide of Imaging Findings Consistent with the History of Trauma Dated 9/1/16	Relevance; prejudicial; hearsay; foundation; best evidence; authenticity	
14	83. Life Expectancy Table	Relevance; prejudicial; foundation; best evidence; authenticity	
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1	84.	Defendant, Liceth Demha-Santiago's Responses to Plaintiff's Request for Production of Documents	Defendant USA herein reserve all objections pending notice of particular responses to be read	
2	85.	Defendants Liceth Demha-Santiago & Juan Demha's Answers to Plaintiffs' Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	
3	86.	Plaintiff's Response to Defendant United States' First Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
4	87.	Plaintiff's First Supplemental Response to Defendant United States' First Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
5	88.	Plaintiff's Third Supplemental Response to Defendant USA's First Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
6	89.	Plaintiff's Response to Defendant Demha's First Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
7	90.	Plaintiff's First Supplemental Response to Defendant Demha's First Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
8	91.	Plaintiff's Second Supplemental Response to Defendant Demha's First Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
9	92.	Plaintiff's Response to Defendant USA's First Set of Requests for Production of Documents	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
10	93.	Plaintiff's First Supplemental Response to Defendant USA's First Set	Defendant USA herein reserve all objections pending notice of particular	Relevance; prejudicial; Hearsay; best

	of Requests for Production of Documents	responses to be read	evidence; foundation	
1	94.	Plaintiff's Second Supplemental Response to Defendant USA's First Set of Requests for Production of Documents	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
2	95.	Plaintiff's Response to United States' Second Set of Interrogatories to Plaintiff	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
3	96.	Plaintiff's Response to Defendant United States' Third Set of Interrogatories	Defendant USA herein reserve all objections pending notice of particular responses to be read	Relevance; prejudicial; Hearsay; best evidence; foundation
4	97.	United States' Responses and Objections to Plaintiffs' First Set of Requests for Production of Documents	Relevance; prejudicial; Hearsay; best evidence; foundation	
5	98.	United States' Responses and Objections to Plaintiffs' First Set of Interrogatories	Relevance; prejudicial; Hearsay; best evidence; foundation	
6	99.	Photographs of Plaintiff's vehicle	(No Bates Number Provided) Relevance; foundation; authenticity	
7	100.	Google Overheads	Relevance; prejudicial; foundation; best evidence; authenticity	
8	101.	T-Mobile Phone Records	Relevance; prejudicial; foundation; best evidence; authenticity	Relevance; prejudicial; foundation; best evidence; authenticity
9	102.	Black Box Data for Defendant's Vehicle - GMC Terrain 2014	Prejudicial; foundation; best evidence; authenticity	
10	103.	IRS Claim Denial with Receipt February 9, 2018	Relevance; prejudicial; foundation	Relevance; prejudicial; foundation
11	104.	IRS Claim Denial without Receipt September 5, 2019	Relevance; prejudicial; foundation	Relevance; prejudicial; foundation
12	105.	IRS Claim Denial with Receipt September 5, 2019	Relevance; prejudicial; foundation	Relevance; prejudicial;

			foundation
1	106.	Government Pictures and Wilson Claim Information	Relevance; prejudicial; foundation
2	107.	IRS Denying Claim for Damages October 6, 2016	Relevance; prejudicial; foundation
3	108.	Nakia McCloud Driver License	Relevance; foundation; best evidence; authenticity
4	109.	IRS Vehicle Information	Relevance; prejudicial; foundation
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